



# RentScore

## RENTSCORE AFRICA LIMITED DATA PROTECTION POLICY

RentScore Africa is a PropTech company in the business of enabling homeownership through access to affordable housing and finance in the Kenyan real estate market through its digital platform. We are the data controller responsible for your personal information when you subscribe to and access/ use any of our services through our web-based and mobile application platforms

### PRIVACY STATEMENT

RentScore respects your privacy and is committed to protecting your personal data. This policy sets out the basis on which we will store and process any personal data we collect from you, that you provide to us, or that is otherwise available to us by your use of this product, our services and our website. Please read this carefully to understand our practices regarding your personal data. By accepting our Terms and Conditions, you consent to the practices described in this policy.

### 1. SCOPE

This policy applies to your use of:

- 1.1 The RentScore mobile application is available on our site and accessible on the Google Play Store.
- 1.2 Any of the services are accessible through the mobile application or on a web-based platform.
- 1.3 Your use of our services through our third-party partners.

### 2. DEFINITIONS AND INTERPRETATION

Unless the context otherwise requires, the definitions of terms in our terms and conditions shall be applicable to this policy.

- 2.1 **“Applicable Law”** means the Laws of Kenya applicable to the storage, control and processing of personal data as may be amended from time to time. These include but are not limited to the Constitution of Kenya and the Data Protection Act of Kenya, together with relevant regulations, rules, guidelines and codes.
- 2.2 **“Cookies”** refers to small data files that are transferred to your computer or mobile device. They enable us to remember your account log-in information, IP addresses, number of times you visit, browser type and version, device details, and date and time of visits.
- 2.3 **“Data Protection Act”** refers to the Data Protection Act No. 24 of 2019 under the Laws of Kenya as amended and modified from time to time



2.4 **“Personal data”** means any information that identifies or can be used to identify an individual directly or indirectly. Personal Data excludes anonymous data or data that has had the identity of you as an individual permanently removed.

2.5 **“Processing”** refers to any operation or set of operations performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.6 **“Third Party”** includes any third parties such as financial services institutions and related entities that RentScore partners with to provide you access to their financial services.

### 3. THE DATA WE COLLECT

3.1 We must receive or collect some information to operate, provide, improve, understand, customize, support, and market our services. This collection may be done directly by us or on our behalf, and may be collected directly from you, from a person acting on your behalf or from publicly available sources of information. This collection of data also includes when you engage with, access, and/or use our services. The types of information we receive and collect depend on how you use our services and the extent of our engagement beyond initial due diligence to the point of disbursement of funds and subsequent repayment of the facility.

3.2 We may collect, use, store and transfer:

3.2.1 **Identity data** which includes name, identity card number/passport number, KRA pin number, date of birth, age, gender, and any other similar information;

3.2.2 **Contact data** which includes your email address, postal address, current and past physical addresses, house number, property details, and telephone number;

3.2.3 **Financial data** which includes your MPESA statements, credit score, bank account details and other electronic payment details;

3.2.4 **Transaction data** which includes details of transactions to and from you in your use of the product;

3.2.5 **Marketing data** which includes your preferences in receiving marketing information from us and our third parties;

3.2.6 **Usage data** which includes information about how you use our products, services and website;

3.2.7 **Demographic data** which includes statistical information derived from the aggregate of our user base not directly attributable to you



**3.2.8 Device/Technical information**, including the type of mobile device you use, unique device identifiers such as your device IMEI/serial number, information about the SIM card used in the device, mobile network information, your device operating system, browser, device location and time zone setting.

**3.2.9 Log information**, including details of your use of our services and your visits to our sites this being traffic data, location data and other communication data

**3.2.10 Third-Party Information**, including information from credit reference agencies, mobile network providers and collection agencies.

**3.2.11 Cookie data**, whereby we and our third-party providers, including marketing partners and analytics providers may use mobile tracking technologies and or website cookies to distinguish you from other users of the mobile application or website and other sites to improve your experience of our products and services.

**3.3** We may also collect information automatically and store it in log files. This information may include your internet protocol address (IP address) browser type, internet service provider (ISP), referring exit pages, operating system, date and time stamps and/or clickstream data. From time to time, we may combine this automatically generated/collected data with other information we collect about you for reasons such as analysis, security, content generation or marketing. We may use analytics tools and software in order to develop and analyze the use of the service. Our third-party partners may access anonymized individual data for analytics to help us understand how the service is used.

**3.4** By uninstalling the application from your device, you withdraw your consent to accessing your information in the future. You may similarly email us at [info@rentscore.africa](mailto:info@rentscore.africa) to communicate your withdrawal of consent.

**3.5** We may keep and share stored customer information after the point of uninstall for as long as necessary for the fulfilment of the purposes for which it was obtained, or for the establishment/exercise/defence of legal claims or fulfilment of legitimate legal obligations or business purposes as provided for in law.

## **4. HOW YOUR DATA IS COLLECTED**

**4.1** We will collect data about you from:

**4.1.1** Information you give us (directly or through our field officers) at the point of applying for a facility through filling a Type form, on the mobile application or on our web-based platforms.

**4.1.2** Information you give us by executing the letter of offer and/or agreements

**4.1.3** Information you give us by corresponding with us on the phone/email/SMS or otherwise



**4.1.4** Information you provide to us by downloading and registering to use the mobile application, subscribing to any of our services (such as tenant screening), sharing data via the mobile application's social media functions, entering a competition/promotion/survey and reporting a problem to us concerning the application/website/services.

**4.2** Information from third parties including but not limited to your landlord, property manager, rent collection payment service provider, bank provider, service providers, regulatory authorities and trusted partners we interact with.

**4.3** It is important to us and to your user experience of our product and services that the information we hold about you is accurate and current. Please keep us informed of any changes to your personal information for the entire duration of our engagement within 30 days of such change, in writing.

## **5. HOW WE USE YOUR PERSONAL DATA**

**5.1** All your personal data is held with us legally and with your consent.

**5.2** We will use it primarily to:

**5.2.1** Fulfil the agreement we have entered into with you or are about to enter into with you as a client to:

**5.2.2** Secure our legitimate interests to give you the best-personalized user experience of our products and services

**5.2.3** Manage our relationship with you by sending reminders on payments and communication about the recovery of the facility in case of default

**5.2.4** Comply with any legal and regulatory obligations upon us with respect to the detection, prevention and investigation of risk, security, crime or fraud

**5.2.5** Facilitate resolution of queries, complaints and other feedback

**5.2.6** Improve our products and services by better understanding your needs and preferences

**5.2.7** Build and manage our brand relationships

**5.2.8** Test new offerings

**5.3** We do this by using your data specifically to:

**5.3.1** To process your transactions;

**5.3.2** To verify your identity;



- 5.3.3 To assess your eligibility as a prospective tenant for a new house or as a landlord seeking short-term finance, process tenant application for the rent deposit and/or rent;
- 5.3.4 To derive a risk profile and an aggregate score;
- 5.3.5 To disburse loans for rent deposits, rent and working capital for landlords and collect payments for your use of the Service;
- 5.3.6 To build the credit models and perform tenant screening and scoring;
- 5.3.7 To analyze customer behaviour;
- 5.3.8 To allow our partners to fulfil their obligations to you;
- 5.3.9 To allow us to fulfil our obligations to our partners;
- 5.3.10 To troubleshoot problems with the Service;
- 5.3.11 To comply with applicable laws, regulations, and rules, such as those relating to "know-your-customer" and anti-money laundering requirements;
- 5.3.12 To detect and prevent fraud and other illegal uses of the Service;
- 5.3.13 To send you marketing notices, service updates, and promotional offers; and
- 5.3.14 To contact you by telephone using auto-dialled or pre-recorded message calls or text (SMS) messages (if applicable) as authorized for the purposes described in this Privacy Policy.

## **6. SHARING YOUR DATA**

- 6.1** Sharing of your personal data with third parties does not alter/waive your right to privacy. We require all third parties to respect and maintain the security and privacy of your data, using it only to process your personal data for specified purposes and in accordance with our instructions.
- 6.2** We do not disclose identifiable data to other parties unless it is necessary for service delivery. We may provide anonymized aggregated information for data analytical purposes only to compile statistical insights relating to our user base/loan portfolio. We may also share limited aggregated information with select partners for research and development purposes.
- 6.3** By using our services you agree that we may, as necessary and appropriate for the purposes, transfer and disclose any customer information to the following recipients:
  - 6.3.1 Regulatory authorities including but are not limited to the Central Bank of Kenya, Insurance Regulatory Authority, and Kenya Revenue Authority in connection with a



formal request, court order or similar statutory requirement, or when we believe in good faith that disclosure is necessary to comply with the law, prevent financial loss, investigate suspicious activity or monitor, investigate and resolve violations of our agreement.

- 6.3.2 Financial institutions, credit reference agencies and bureaus through which your financial transactions are processed for the purpose of obtaining credit references.
  - 6.3.3 Institutions we interact with to provide services to you such as your mobile service provider
  - 6.3.4 Third parties acting as sub-contracts, agents, service providers, associates of RentScore and professional advisers such as lawyers, bankers, auditors, insurance providers and accounting services
  - 6.3.5 Third parties where we have established prior consent from you where we believe the marketing information will be relevant to you and your interests
  - 6.3.6 Persons acting on your behalf as beneficiaries, account nominees, legal representatives, correspondents and agent banks
- 6.4 At all times you are within your rights to opt out of receiving marketing messages from third parties by writing to us, following opt-out links within the marketing messaging, or otherwise adjusting your marketing preferences in our product/service or on your device. As described above, we may use your personal information to provide you with target messaging/advertisements/marketing communications we believe is relevant to you.
- 6.5 For more information about how this works, please visit the Network Advertising Initiative's (NAI) [educational page](http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work) <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>
- 6.6 You may opt-out by following these links:
- 6.6.1 Facebook - <https://www.facebook.com/settings/?tab=ads>
  - 6.6.2 Google - <https://www.google.com/settings/ads/anonymous>
  - 6.6.3 Bing - <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>
- 6.7 Additionally, you may opt-out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at <http://optout.aboutads.info/>.
- 6.8 For cookies, you may opt out by following the instructions on your browser or device (usually located under "Settings" or "Preferences") to modify your cookie settings. Please note that



turning off cookies or otherwise modifying your preference may alter your experience of our services as they were intended.

## **7. HOW WE KEEP YOUR DATA SECURE**

**7.1** The data that we collect from you is stored on our secure servers. When you have downloaded our application onto your phone, it is your responsibility to keep your device safe to prevent third-party interference either physically or digitally.

**7.2** If you have chosen a password on the mobile app, or such other security authentication, which enables you to access certain parts of our site, you are responsible for keeping this information confidential. We ask you not to share a password/device access with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## **8. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA**

**8.1** We generally do not transfer personal data to another country. However, from time to time we may transfer your personal data outside Kenya for legitimate business or legal reasons. Where we send your personal data outside Kenya, we ensure that your data is properly handled and protected in accordance with the DPA.

**8.2** You acknowledge that personal data that you submit for publication through our website/online platform or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **9. HOW LONG WE SHALL RETAIN YOUR DATA**

**9.1** We will only retain your personal data for as long as it is reasonable and necessary in order to fulfil the purposes we collected it for, including satisfying contractual, legal, regulatory, tax and accounting requirements. Where our engagement with you has come to an end, through termination by either party, we will delete, erase, anonymize your data or make it pseudonymous depending on the classification and purpose of the data.

## **10. YOUR RIGHTS**

**10.1** Subject to legal and contractual exceptions, you have a right to:

10.1.1 Access the personal data we hold about you;

10.1.2 Consent or object to the processing of your personal data;

10.1.3 Request that your data be transferred to another organization or to you;



10.1.4 Request that we correct your personal data where it is inaccurate or incomplete;

10.1.5 Complain to a supervisory authority on how your data is being processed;

10.1.6 Request that we erase your personal data, subject to our legal and compliance obligations as well as entitlement to secure ourselves against risks associated with erasing your personal data;

10.2 All requests under this section shall be handled within a reasonable time, subject to the complexity or otherwise of the circumstances. We will require you to provide identification information to confirm the legitimacy of your request.

10.3 These rights are subject to certain limitations and exceptions as defined in law. You may exercise any of your rights in relation to your personal data by written notice to us, using our contact details set out in the website/online platform.

## **11. CHANGES TO THIS PRIVACY POLICY**

**11.1** This Privacy Policy shall at all times be accessible on our website and on our platform. It may be updated from time to time to reflect changes in our practices with regard to your personal data, and/or changes in the applicable law. It is important that you regularly revisit this Policy on our site as well as on the mobile app, in addition to any other statements we may provide from time to time so that you are aware of how and why we are using your personal data. Questions, comments and requests regarding this policy should be addressed to [info@rentscore.africa](mailto:info@rentscore.africa)

## **12. DISPUTE RESOLUTION**

12.1 RentScore Africa will respond to any complaints after due inquiry/investigation. We will review complaints, register along with responses and the unresolved complaints at the end of each day and ensure those complaint resolution guidelines are complied with.

12.2 Each of the parties under this agreement will be entitled to enforce its rights in the event of a breach of the terms of this privacy policy, to recover damages caused by any breach of the provisions herein and exercise all other rights existing under law.

12.3 Any claim or dispute arising in relation to this privacy policy shall be subject to the jurisdiction of the courts of the Republic of Kenya. We shall not be liable for any breach where a claim in respect of such breach is not brought within one month of the date that such breach arose.

## **13. DISCLAIMER**

13.1 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability





for these policies. Please check these policies before you submit any personal data to these websites.

13.2 By subscribing to our products and/or services, you confirm that you have read, understood and accepted to be bound by the terms thereof.

#### **14. DATA PROTECTION OFFICER**

**14.1** If you would like to contact us on any matters relating to this policy you can contact our data protection officer through email at: [info@sisulelaw.com](mailto:info@sisulelaw.com) / [startup@sisulelaw.com](mailto:startup@sisulelaw.com) or through post

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