

# Privacy Policy

**Updated: June 4, 2019**

Ayannah has created this Privacy Policy to let you know what information we collect when you visit our site, why we collect it and how it is used, in accordance with the Philippine Data Privacy Act of 2012 and its implementing rules and regulations.

This Privacy Policy explains the data collection and use practices of Kaya Credit. The terms “you,” “your,” and “yours” refer to the customer utilizing any of our products and services. The term “Ayannah”, “Kaya Credit”, “Platform”, “we”, “us”, and “our” refer to Ayannah Business Solutions, Inc. By using this website, you consent to the data practices prescribed in this statement. We may periodically make changes to this Privacy Policy that we will include on this page. It is your responsibility to review this Privacy Policy frequently and remain informed about any changes to it, so we encourage you to visit this page often.

If you do not agree to the terms of this Privacy Policy, please do not use this site.

## **How we collect information about you**

We shall collect and use data and information about you (including Personally Identifiable Information and/or Sensitive Personal Information) disclosed to us for the creation and registration of your Kaya Credit Account and the provision of the Services. The data and information will include data coming directly from you, manually or through automated processes (such as through communication with the internet and other online networks), and information from the public directory and domain.

By registering for an account with us, you are accepting the terms of this Privacy Policy.

We may collect information that identifies you (**Personally Identifiable Information**) when you use Kaya Credit. The types of information that we collect may include any of the following:

- (a) your name, address, phone number, birth date, email address, credit card, and other personal and financial information;
- (b) information or data pertaining to any Loan Offer or Loan Contract;
- (c) other information that you provide to us but that does not identify you personally, such as records of your visits and information that you submit when using the Platform;
- (d) information from third parties; and
- (e) traffic and usage information generated from your visits to the Platform, including the type of device that you use to access it.

We may also collect the following types of information (**Sensitive Personal Information**):

- (a) information about your race, ethnic origin, marital status, age, color, and religious affiliations;
- (b) government IDs or other forms of identification;
- (c) information about your health or education; and
- (d) information relating to any proceeding for any offense committed or alleged to have been committed by you, the disposal of such proceedings, or the sentence of any court in such proceedings.

We may use one or more of the following technologies to collect Personal Information and other information: cookies, flash cookies, general log information, and referral information from third-party websites. We may also use tracking technologies to collect information about your visits over time and across third-party websites or other online services. We may likewise access, collect and use from other countries the information recorded by credit reference and fraud prevention agencies.

### **How we use the personal information we collect**

We may use the Personal Information that we collect for any of the following purposes:

- (a) to provide, operate, maintain, improve, and promote the Platform and provide the Services;
- (b) to enable you to access and use the Platform, including uploading, downloading, collaborating on, and sharing content;
- (c) to keep you informed about your activities using the Platform;
- (d) to send transactional messages, including
  - i. responding to your comments, questions, and requests
  - ii. providing customer service and support, and
  - iii. sending you technical notices, updates, security alerts, and support and administrative messages;
- (e) to send promotional communications, such as providing you with information about services, features, newsletters, offers, promotions, contests, events;
- (f) to monitor and analyze trends, usage, and activities in connection with the Platform and for marketing or advertising purposes;
- (g) to investigate, identify, prevent, detect or tackle fraudulent transactions,
- (h) unauthorized access to the Platform, money launder and other illegal activities;
- (i) to personalize the Platform content, features, or advertisements
- (j) to identify which of our, or others', products might interest you and inform you about them; and
- (k) for statistical analysis and market research.
- (l) to enable you to access online application forms on third party external sites.

- (m) to enable third party providers to contact and assist you if you express interest in their products or services.

## **How we share personal information**

### 1. We may disclose your information:

- (a) to our agents and subcontractors, acting for us, for any of the purposes described in this Privacy Policy;
- (b) to our customers and/or business associates, where such information are necessary for the conduct of business and commercial transactions (i.e exchange of business contact information);
- (c) to our affiliates, within and outside the Philippines;
- (d) to any agent or third party service provider who provides administrative, telecommunications, legal services or other services to us in connection with the maintenance of the Platform and the provision of the Services;
- (e) to such sub-contractors or third party service or product providers as we may determine to be necessary or appropriate;
- (f) to law enforcement agencies and fraud prevention agencies for the purposes of identifying, preventing, detecting or tackling fraud, money laundering and other crime;
- (g) to any person or governmental authority to whom we are compelled or required to make a disclosure of your data and information under applicable law or to meet our obligations to any relevant regulatory authority; and
- (h) if we have to by law or it is in the public interest.

2. It is necessary for us to disclose and forward your information to the lender that you will select by clicking on the “Apply for a Loan” button on our Platform. The selected lender may contact you for the purpose of processing the product or service.

3. We may also disclose your information to other potential lenders that can assist you if you apply for a loan by providing you with alternative loan offers and services not available on the Platform. These lenders may contact you for the purpose of processing the product or service.

4. In the course of operating your Kaya Credit account and the Platform, we may also send to lenders and their assignees, or to borrowers, as the case may be, certain transactional data (for example, Platform Membership Number, name, loan amount and repayment details) but not your personal address or payment details.

5. We and other organizations may access and use from other countries the information recorded by credit reference and fraud prevention agencies for the purposes of assessing lending risks and identifying, preventing, detecting or tackling fraud, money laundering and other crime.

6. We may transfer your information abroad to countries whose data protection laws are less strict, and less protective of your rights, than in the Philippines.

### **How we use cookies**

When you access our website or content or use any of our applications, we or companies we work with may place small data files called cookies or pixel tags on your computer or other device. We use these technologies to:

- (a) recognize you as our customer;
- (b) customize any of our services, content, and advertising;
- (c) measure promotional effectiveness; and
- (d) collect information about your computer or other access device to mitigate risk, help prevent fraud and promote trust and safety.

We use both session and persistent cookies when you access our website or content. Session cookies expire and no longer have any effect when you log out of your account or close your browser. Persistent cookies remain on your browser until you erase them or they expire.

Ads appearing on the Platform may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad servers to recognize your computer each time they send you an online advertisement in order to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers our use of cookies on the Platform and does not cover the use of cookies by any advertisers, each of whom maintain their own privacy policy.

### **How we protect and store personal information**

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been anonymized so that it does not identify a specific user.

We take reasonable technical and organizational security measures to protect your data and information against loss, misuse, and unauthorized access, disclosure, alteration and destruction. Personal information shall be stored in secure physical locations and/or secure servers located in the Philippines and/or any other jurisdictions to where your personal information may be transferred.

### **How long do we keep your personal information**

By submitting personal information to Ayannah, you agree that it may be used in all the ways described above. Your personal information shall be stored for such period as we deem necessary in the maintenance of the Platform, the provision of the Services and in accordance with applicable law. You also agree to inform us promptly of any misuse of your Platform Account or the Platform of which you are aware.

### **How you can exercise your rights as a data subject**

You are granted rights under applicable law with respect to our processing of your Personal Information. These rights including, among others, your right reasonable access to the contents and sources of your Personal Information, the recipients of your Personal Information, and the manner by which your Personal Information was processed. You are likewise entitled to update or correct any error in your Personal Information by logging in to your account and clicking the My Profile tab of the Platform.

If, at any time, you wish to withdraw this consent with how we collect and use your Personal Information or to request access to, copies of, or amend your Personal Information, you should notify us in the manner provided in this Privacy Policy.

### **How you can contact us about privacy questions**

If you have questions or concerns regarding this policy, you may write to our Data Protection Officer at Unit 3003 Jollibee Plaza F. Ortigas Jr. Rd., Ortigas Center, Pasig City, Philippines or contact +632 636 8320 loc. 108 or email [privacy@ayannah.com](mailto:privacy@ayannah.com).