

JOINAI PRIVACY POLICY

Protecting your private information is our priority. This Privacy Policy applies to the website and services of Joinai and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to Joinai means Joinai Financial Services (Pvt) Limited, having its office at Joina Clty, Cnr Julius Nyerere Way and Jason Moyo Avenue, Harare, Zimbabwe.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By using the Joinai website or services, you consent to the data practices described in this Privacy Policy. If you do not agree with any part of this Privacy Policy, then we cannot make our website or services available to you and you should stop accessing and using them.

Joinai encourages you to review the privacy statements of websites you choose to navigate to from Joinai so that you can understand how those websites collect, use and share your information. Joinai is not responsible for the privacy statements or other content on websites outside of the Joinai website or software.

This Privacy Policy is provided in accordance with Joinai' obligations under applicable privacy and data protection law. Definitions in this Privacy Policy shall be as set out in the Applicable Data Protection Law. For the purposes of this Privacy Policy, the term "personal data" means any information which identifies you or which allows you to be identified when combined with other information. It does not include data where the identity has been removed (anonymous data).

For the purposes of Applicable Data Protection Law, Joinai is a data controller (for example, when collecting personal data from our customers to provide them with an account and/or our financial services, send them marketing information and collecting personal data from our staff and consultants). Joinai may also be a data processor where it processes personal data belonging to another party under their instruction and control. This Privacy Policy primarily applies in the context where Joinai is a data controller.

Collection of your Personal Information

Joinai may collect and process personal data, such as your name and email address if you enter these on the contact form on our website or to fulfil our contractual obligations - to provide our services, invoice and receive payment for services, send legal updates, news and information about our services and related services. We may gather additional personal or non-personal information in the future.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, and social media accounts.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and to others and other details of services you have purchased from us.

Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device model and other technology on the devices you use to access this website or our software.

Profile Data includes your username and password, purchases, orders or contributions made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Compliance Data includes information required by regulators or law enforcement under compliance procedures (e.g. AML/KYC) or applicable law in connection with efforts to prevent money laundering, criminal activity and terrorist financing, such as relationship to the beneficiary of the transaction, the purpose of the transaction and proof of funds.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy. This information is used for the operation of the website and the services provided by Joinai, and to provide general statistics regarding use of the Joinai website and services.

In the course of providing our services we may collect Special Categories of Personal Data (such as details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) and information about criminal convictions and offences.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your name, email address and contact details in person, or by filling in forms on our website or by corresponding with us by post, phone, email, social media or otherwise.

This includes personal data you provide when you:

- request an account or our services;
- download or access our web or mobile wallet;

- meet with one of our employees or consultants;
- participate in an event which we have organised;
- complete a form on our website requesting us to contact you;
- subscribe to our publications or newsletter;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- submit an application for a role within Joinai; or
- make a complaint or give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

Automated technologies through the use of our website or services. In your use of our website or services (including receiving our newsletter), certain Usage Data is transmitted to us such as the device you are using, your IP address and other such data.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- Technical Data or Usage Data from analytics providers or search information providers.
- Employment, Identity and Contact Data from third party recruitment agencies. **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the services you have with us but we will notify you if this is the case at the time.

Purposes for which we will process your personal data

Joinai collects and uses your personal information to operate its website(s) and deliver the services you have requested including processing your account application. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message (although we may also rely on legitimate interests). You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or user	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver services including: (a) Manage payments, fees and charges	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>(b) Make a decision regarding your identity and whether to provide an account or wallet</p> <p>(c) Collect and recover money owed to us</p>	<p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p> <p>(f) Compliance</p>	<p>(c) Necessary to comply with a legal obligation</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
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<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
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	<p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage (c) Financial (d) Compliance</p>	<p>Necessary for our legitimate interests (to define types of customers suitable for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business).</p>

<p>To comply with any laws or regulations that apply to us, for example investigating fraudulent claims, carrying out fraud, credit and anti-money laundering checks and preventing other crimes.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p> <p>(f) Compliance</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to prevent fraud and criminal activity).</p> <p>(c) Necessary to comply with a legal obligation.</p>
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Joinai may also use your personally identifiable information to inform you of other products or services available from Joinai and our partners. Joinai may also contact you via surveys to conduct research about your opinion of our website and services. Joinai does not sell, rent or lease or provide in any other way its customer lists to third parties.

Joinai may keep track of the websites and pages our users visit within Joinai and which services our users access. This data is used to deliver customised content within Joinai to customers whose behaviour indicates that they are interested in a particular subject area.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Transfer of Personal Data

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our 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 and applicable law. You agree that Joinai may share data with trusted partners to help provide our services including to perform electronic ID verification checks, KYC/AML compliance checks, credit-checks, fraud prevention, facilitate our foreign exchange transactions, statistical analysis, send you email or postal mail, provide customer support and IT support, or securely store your data. All such third parties are required to maintain the confidentiality of your information.

We may also transfer your personal data to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

Whenever we transfer your personal data out of Zimbabwe, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Joinai will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- (a) conform to the edicts of the law or regulation comply with legal process served on Joinai or the site;
- (b) protect and defend the rights or property of Joinai; and,
- (c) act under exigent circumstances to protect the personal safety of users of Joinai, or the public.

Additional Information regarding Third Party Tracking Services

Personal Data is collected for the following purposes and using the following services:

- **Analytics**

The services contained in this section enable Joinai to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of www.Joinai.tech, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy – Opt Out

Google Tag Manager (Google Inc.)

Google Tag Manager is an analytics service provided by Google Inc. Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

Google AdWords conversion tracking (Google Inc.)

Google AdWords conversion tracking is an analytics service provided by Google Inc. that connects data from the Google AdWords advertising network with actions performed on www.Joinai.Africa

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on www.Joinai.tech.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

● **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from our website . The interaction and information obtained through our websites are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

X/Twitter Tweet button and social widgets (X, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data. Place of processing: US – Privacy Policy

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

Joinai will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Data reviewed regularly for relevance. Any data deemed no-longer relevant is deleted. Joinai shall keep personal data of customers for at least seven years from the date of closing an account. If your account application is declined Joinai will keep this personal data for 5 years from the decision. If your account is subject to any dispute or complaint it will keep personal data relating to this issue for 6 years from the case being closed. Joinai shall keep staff HR-related personal data of employees and consultants for at least seven years. Joinai shall keep emails of clients and prospective clients for as long as it has a legitimate interest to do so.

If you have a question about our data retention periods please contact us at Privacy@Joinai.Africa

Use of Cookies

The Joinai website may use “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. Our website uses cookies and similar technologies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Children Under Thirteen

Joinai does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website or our services.

Opt-Out & Unsubscribe

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from Joinai by contacting us or selecting the “Unsubscribe” option on their email.

Your Legal Rights

You have the right to:

- **Request access to your personal data (commonly known as a "data subject access request").**

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.** You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **Right to object to automated individual decision-making, including profiling.** This will apply where we perform automatic checks (e.g. fraud prevention, KYC/AML, electronic ID verification checks) when determining whether to provide you with an account. You have a right to object to such automated

processing, and in that case we may either process your application manually or decline to proceed with your application on the basis that such processing would be required for the performance of a contract to provide you with our services.

No fee usually required.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to this Privacy Policy

Joinai will occasionally update this Privacy Policy to reflect company and customer feedback and any changes in data protection regulations. Joinai encourages you to periodically review this Privacy Policy to be informed of how Joinai is protecting your information.

Contact Information

Joinai welcomes your questions or comments regarding this Privacy Policy. If you believe that Joinai has not adhered to this Privacy Policy, please contact Joinai at Privacy@Joinai.Africa

Effective as of 06 December 2024