JazzCash Pakistan (Private) Limited and JazzCash (Private) Limited Customer Privacy Notice ("Privacy Notice")

1. Introduction

JazzCash Pakistan (Private) Limited providing branchless banking services through Mobilink Microfinance Bank ("**MMBL**") and JazzCash (Private) Limited, a licensed non-banking finance company (collectively "**JAZZCASH**") are committed to delivering innovative and accessible digital financial services. Protecting your privacy and safeguarding your personal information are central to how we design, operate, and improve our products and services. This Privacy Notice explains how we collect, use, process, store, share, and protect your personal information when you use:

- the JazzCash website at https://www.jazzcash.com.pk
- the JazzCash mobile application and account;
- customer support channels; and
- any other services and products offered by JazzCash or our authorized partners, vendors, suppliers or service providers.

By using our products or services, you acknowledge and agree to this Privacy Notice and any additional terms applicable to specific products or services.

2. Scope Of This Privacy Notice

This Privacy Notice outlines how JAZZCASH collects, uses, processes, stores, shares, and protects your personal information when you interact with our products, services, websites, mobile applications, customer support channels, and partner platforms.

It is important to note that additional privacy disclosures, notices, or service-specific terms may apply in certain situations, particularly where specific products, partnerships, campaigns, or regulatory requirements require further transparency. Where applicable, JAZZCASH may make dedicated privacy notices or supplemental disclosures digitally available to customers through relevant channels.

In circumstances where JAZZCASH determines the purpose and means of processing personal information, JAZZCASH acts as a data controller. Where JAZZCASH processes personal information on behalf of another entity while providing services, JAZZCASH acts as a data processor and processes such information in accordance with applicable laws and contractual obligations.

3. Our Privacy Principles

At JazzCash, we are committed to handling personal information responsibly, transparently, and securely.

When processing your personal data, we follow these principles:

- We process personal information in accordance with applicable laws, regulations, and this Privacy Notice.
- We are transparent about how and why we collect and use your information.
- We collect only the information reasonably necessary to provide, secure, improve, and personalize our services.
- We retain information only for as long as necessary while offering products, for regulatory, legal, and security purposes.
- We implement appropriate technical and organizational safeguards to protect your information.
- We respect your privacy rights and provide mechanisms to help you exercise them.
- We build privacy and data protection into our products and services by design and by default.
- We continuously improve our security and privacy practices to maintain customer trust.

4. What Personal Information We Collect?

The information we collect depends on the products, features, and services you use and subscribe to.

The personal information we collect, particularly in respect of your bank account with MMBL, adheres to applicable laws of Pakistan, including but not limited to the Microfinance Institutions Ordinance, 2001, Prudential Regulations for MicroFinance Banks, AML/CFT/CPF Regulations, Branchless Banking Regulations, and any other SBP and/or SECP instructions/circulars, as well as per JAZZCASH's policies.

A. Identity and Contact Information

We may collect:

- full name;
- date of birth;
- CNIC/NICOP or passport details;
- biometric verification data;
- gender;
- photograph and biometric verification information;
- phone number;
- email address;
- residential or mailing address;
- source of income, and professional details where applicable; and
- any other customer due diligence (KYC/CDD) information.

B. Financial and Transaction Information

- wallet account information;
- payment card information;
- transaction history;
- billing and payment information;
- lending and repayment history;

- credit bureau information;
- buying and spending behavior; and
- fraud and risk assessment information.

C. Device, Usage, and Technical Information

When you use our applications or websites, we may automatically collect:

- device identifiers;
- IP address;
- browser and operating system details;
- login information;
- usage analytics;
- cookies and similar technologies;
- approximate location information.

D. Communications and Support Information

We may collect information relating to:

- customer support interactions;
- complaint records;
- emails, calls to Customer Care channel;
- surveys and feedback; and
- reports relating to fraud, disputes, or service issues.

E. Information from Third Parties

We may receive information from:

- banks and financial institutions;
- payment partners;
- merchants;
- credit bureaus;
- law enforcement agencies;
- analytics and advertising partners;
- group companies and affiliates; and
- regulatory authorities.

5. How We Collect Your Information

We collect personal information when you:

- Create or register a JazzCash account through the mobile application;
- Use payments, transfers, lending, insurance, or other services;
- Contact customer support or file complaints;
- Participate in promotions, surveys, or market research;
- Interact with our communications or advertisements;
- Link third-party services or payment methods to your account;

- Apply for employment opportunities.

We may also collect information automatically through cookies, web beacons, device identifiers, and similar technologies.

6. Why We Use Your Information

We use your personal information for legitimate business, operational, regulatory, and security purposes.

A. To Provide and Manage Services

We use your information to:

- Create and maintain customer accounts;
- Process payments, transfers, and transactions;
- Verify customer identity and authenticate access;
- Deliver requested products and services;
- Manage lending and repayment services;
- Provide customer support;
- Send transactional alerts, OTPs, receipts, and service notifications;
- Determine eligibility for financial products and services;
- Recover outstanding payments and manage credit-related activities.

B. To Improve Products and Customer Experience

We use information to:

- Analyze usage patterns and customer preferences;
- Improve platform functionality and performance;
- Develop new products and services;
- Conduct research and analytics;
- Personalize customer experiences and recommendations.

C. To Protect Security and Prevent Fraud

We process information to:

- Detect and prevent fraud, money laundering, and unauthorized activity;
- Monitor suspicious transactions and security threats;
- Secure customer accounts and systems;
- Investigate disputes, complaints, and regulatory matters;
- Fulfill AML/CFT obligations and legal requirements.

D. Automated Decision-Making / Profiling

JAZZCASH may use automated systems, models, analytics, artificial intelligence, machine learning tools, or other technologies to support decision-making processes relating to fraud prevention, anti-money laundering monitoring, customer verification, risk assessments, eligibility determination, credit scoring, service personalization, and regulatory compliance.

These processes help us improve the efficiency, security, accuracy, and delivery of our products and services. Where appropriate, automated assessments may be supplemented by human review and oversight in accordance with applicable laws, regulatory requirements, and internal policies.

E. Marketing and Communications

We may use your information to:

- Send promotional offers and updates;
- Recommend products and services;
- Conduct customer research and surveys;
- Deliver personalized communications and advertisements.

7. Basis for Use and Processing

JazzCash uses, processes and shares your personal information or data where:

- Processing and use is necessary to provide products or services;
- Processing and sharing is required to comply with legal or regulatory obligations such as preserving call records for a specific period;
- You have provided consent to use data for certain purposes;
- Processing is necessary for fraud prevention, security, or legitimate business and other interests of the public or JAZZCASH including direct marketing, market research, fraud, and money laundering prevention to mitigate credit and fraud risks and safeguard our business.
- To meet the terms of our agreement with you and provide you with our products and services and manage your account.
- when you have obtained permission from any third parties whose personal or sensitive information you have provided to us in connection with JAZZCASH’s products and services (such as JAZZCASH's insurance), allowing us to receive and handle that information for those purposes.

8. How we seek your Consent?

Our website always has the latest version of this Privacy Notice, and significant updates to this notice (as required by law and regulations). A hyperlink to this Privacy Notice is included in all agreements of JAZZCASH with corporate clients. By accepting the Privacy Notice, you expressly agree to JAZZCASH’s collection, handling, storage, use, and disclosure of your personal information. This includes your consent to the transfer and storage of information on our servers or by licensed private credit bureaus, JAZZCASH’s authorized partners, vendors, suppliers, or service providers.

9. How we use your information?

We at JAZZCASH initially use your personal information and/or data for delivery of products/ services, and to improve our products and services, while ensuring your privacy is protected. We aggregate data to analyze usage patterns. This allows us to tailor our offerings, maintain communication, and occasionally recommend products and services tailored to your interests, all while safeguarding your identity.

Depending on the circumstance, we may rely on your consent or the fact that that the processing is necessary to protect your vital interests or those of other persons, or to comply with the applicable laws. We may also process your personal data where we believe it is in our or others' legitimate interests, taking into consideration your interests, rights, and expectations.

Only after this internal use, we consider sharing encrypted information with third parties, ensuring that personal information is disclosed in compliance with applicable regulatory and organizational requirements. In specific cases where sharing data is necessary for service requests, marketing, or customer profiles, we share only the required data and uphold privacy protections in line with this Privacy Notice.

We may additionally use your personal information and/or data to:

- notify you of changes to the functionality of a service or introduce you to a new service that we believe may catch your attention or be of interest to you.
- determine your interests and eligibility to provide you with relevant products, services, and surveys and to develop them accordingly.
- enhance our own products and services and those of our third-party partners and create new ones.
- Notify you through various communication methods such as phone, email, text, online banner advertising, or other means of information about our products and services or those of selected third parties that we believe may interest you. In certain cases, we require your consent for this marketing activity. You can modify your marketing preferences anytime by utilizing the link provided or short code in any marketing communication you receive.

We retain your personal information/data for the period necessary to fulfill the purposes for which it was collected, including as outlined in this Privacy Notice and our service specific privacy disclosures. When assessing retention, we first carefully examine whether it is necessary to retain the personal data collected and if retention is required, we will retain the personal data for the minimum period permitted under the applicable law.

10. Who We Share Your Information With?

- **With Securities and Exchange Commission of Pakistan (SECP):** We share personal information with the SECP in the format prescribed by it from time to time. This sharing also extends to the inspection of our books and records.
- **With State Bank of Pakistan (SBP):** We share personal information with the SBP in the format prescribed by SBP from time to time. This sharing also extends to the inspection of our books and records.
- **With Credit Bureaus**: Personal information is shared with Credit Bureaus in accordance with the Credit Bureaus Act of 2015.
- **With Auditors:** Personal information is provided to our auditors for the purpose of auditing our accounts.

- **For Crime Prevention or Detection:** Personal information may be shared for the prevention or detection of crime or the apprehension or prosecution of offenders, as may be authorized by or under any law of Pakistan.
- **With Law Enforcement Agencies and Competent Courts:** Information may be disclosed to any authority, law enforcement agencies, and competent court as required by law.
- **With Service Providers and Business Partners**: Personal information may be shared with service providers, vendors, suppliers and business partners as per applicable agreements.**With Group Entities, Affiliate Bodies and Subsidiaries**: Personal information may be shared with Group Entities, Affiliate Bodies and Subsidiaries in compliance with applicable laws, and the terms of this Privacy Notice.
- **With third parties undertaking credit referencing**: Information may be shared with third parties undertaking credit referencing. These third-party agencies may retain customer information as required by their own policies and legal obligations; however, any further sharing of your data is contractually restricted.

In all cases where personal information is shared with third parties, JAZZCASH takes reasonable steps to ensure that such recipients access only the information necessary for the relevant purpose and are subject to appropriate contractual obligations relating to confidentiality, privacy, information security, and compliance with applicable laws and regulatory requirements

11. Why we keep hold of your information?

This retention is essential for the following purposes:

- **Necessary for Specified Purposes (e.g. Legal Hold):** We may keep your information as required by applicable laws or for legal proceedings.
- **Dispute Resolution:** Retaining data is crucial for resolving any disputes that may arise during or after your engagement with us.
- **Fraud Prevention and Detection:** We may retain your information to prevent and detect fraudulent activities, ensuring the security of our services.
- **Verification of Account History:** Maintaining historical data allows us to verify your account history and provide you with accurate and efficient services.
- **Fulfillment of Legal and Regulatory Requirements:** Compliance with legal and regulatory obligations necessitates the retention of certain information.
- **Fulfillment of legitimate business interests:** We retain your information for our billing and record purposes and to fulfill legitimate business interests such as operating, maintaining and improving our services.

12. Factors Influencing Retention Period

Several factors influence the duration for which we retain your information, including:

- **Type of Information Collected:** The nature and sensitivity of the information play a role in determining the retention period.

- **Specific Purpose for Data Usage:** The purpose for which your data is collected and processed influences how long we need to keep it.
- **Customer's Product/Service Usage Patterns:** Understanding how you use our products or services helps us tailor our retention practices to better serve you.

13. What is our Retention Period?

We shall maintain all necessary records on transactions for a period of up to 10 years from the completion of a transaction. We shall also keep records on the identification/relationship data obtained through Customer Due Diligence Process for 10 years following the termination of business relationship in line with applicable laws.

Following expiry of applicable retention periods, personal information will be securely deleted, destroyed, anonymized, or irreversibly de-identified unless further retention is required by law

However, records can be retained for longer periods, if required by any other law or where transactions and or relationship/identification data relates to any investigation, litigation, or is required by a Court of law or any other competent authority.

14. Other Important things to know

A. What are our policies on cookies and tracking technologies?

We use cookies and web beacons to collect information about how you use our website, online products and services, which helps us to tailor them according to your preferences. Cookies are small text files that stay linked to your browser and allow us to recognize you when you visit our website again. They also enable us to keep track of the products or services you view so that we can send you news about them. We use cookies to measure traffic patterns, determine which areas of our website have been visited, and improve our online products and services. Additionally, we may log IP addresses to analyze trends, administer the website, track user movements, and gather demographic information.

It should be noted that any data usage tracking done by third parties through cookies, pixels integration, applets, or scripts over the website and mobile application is not covered in this document. JAZZCASH only provides access to such resources, and any terms or agreements with third party web service providers are agreed upon by the user and the third party, without JAZZCASH being a party unless explicitly mentioned otherwise.

To learn more about cookies, including how to manage and delete them, please visit www.allaboutcookies.org.

B. What security measures do we use to protect your personal information?

JAZZCASH is dedicated to preserving the confidentiality, availability and integrity of personal information in accordance with legal and regulatory requirements and its detailed information security and data protection policies. Upholding privacy of customers information is an essential aspect of JAZZCASH's business operations. Protecting personal information is a top priority for us, and we take reasonable measures to securely store your information to prevent unauthorized use, access, modification, or disclosure. We use physical and electronic security protocols to ensure the security of your information.

JAZZCASH has strict policies in place that control how we share your personal data with other companies. Before sharing personal data with any company, we thoroughly vet the company in advance and assess the security controls the company has in place to protect your personal data.

You are responsible for keeping your account secure by keeping your passwords, PINs, and one-time passcodes private. Do not share this information with anyone, as it may allow them access to your account and personal data.

C. What security measures are in place to protect personal data?

- JazzCash maintains compliance with internationally recognized information security standards, including PCI DSS and ISO 27001:2022, to ensure the protection of customer information and payment data.
- Access controls and identity management mechanisms are in place to prevent unauthorized access to systems and data.
- Personal and sensitive data is protected through appropriate cryptographic controls, including encryption of data in transit and at rest, where applicable.
- Secure software development practices are embedded throughout the mobile application lifecycle, including security testing and vulnerability management processes.
- Access to personal data is granted strictly on the principle of least privilege and on a need-to-know basis.
- Continuous monitoring, logging, and security event management capabilities are implemented to detect and respond to suspicious activities.
- Endpoint protection, malware prevention, and data loss prevention controls are deployed to protect critical systems and customer data.
- Regular vulnerability assessments, penetration testing, and security reviews are conducted to identify and remediate security weaknesses.
- Third-party service providers are subject to security and privacy assessments to ensure that customer information remains adequately protected.
- Employees and contractors handling customer data are required to comply with information security and privacy policies and undergo periodic security awareness training.

These measures are in place to safeguard your information and maintain your trust in our services.

D. What are the rights of individuals regarding their data?

At JAZZCASH, we prioritize more than just legal compliance; we are dedicated to fostering a culture that respects privacy and honors the trust you place in us. You have the right to:

- be told how we use your personal data;
- ask us to correct your personal data if you think its wrong;
- object to us processing your personal data for marketing purposes;
- access your data and request information pertaining to you, where all access requests will be handled in accordance with applicable laws.
- request correction of inaccurate information;
- request updating of incomplete information;
- request deletion where permitted by law;
- ~~withdraw consent where processing is based on consent;~~
- lodge complaints through available grievance mechanisms.

E. How We Handle Data Breaches

At JAZZCASH, we have established comprehensive procedures for detecting, reporting, and responding to data breaches to ensure the highest level of security and compliance.

- Our dedicated Security Operations Center (SOC) team is responsible for the timely detection and response to cybersecurity incidents. This includes identifying potential data breaches swiftly and taking immediate action to mitigate risks.
- In the event of a data breach, incidents are managed in close coordination with our Data Protection Officer (DPO) and other relevant stakeholders. This ensures that all necessary parties are informed and involved in the resolution process.
- We have detailed incident management procedures based on cybersecurity policy and industry best practices. These procedures outline the steps to be taken to manage and resolve incidents effectively, ensuring compliance with regulatory requirements.
- Where required by applicable laws or regulatory requirements, JazzCash shall notify affected customers and relevant regulators of material personal data breaches

By adhering to these protocols, JAZZCASH ensures that any data breaches are handled efficiently and transparently, maintaining the trust and security of our customers' personal information.

15. Changes to this Privacy Notice

JAZZCASH may update this Privacy Notice from time to time to reflect changes in applicable laws, regulations, technologies, business practices, operational requirements, or service offerings.

Where required by applicable law or regulatory requirements, we may notify customers of material changes through appropriate communication channels.

The latest version of this Privacy Notice will always be available on the JAZZCASH website, mobile application, and other relevant digital channels. Continued use of JAZZCASH products and services following the publication of an updated Privacy Notice shall constitute acknowledgement of such changes, to the extent permitted by applicable law.

16. Contact us

If you have any other questions about your privacy and how we use your personal information/data, feel free to call Customer Care on the following numbers and address:

- o JazzCash Helpline: 4444
- o JazzCash Complaints Email: complaints@jazzcash.com.pk

- **List of Name of our offered services**

Our Digital Platforms

- JazzCash Mobile Application
- JazzCash Website (www.jazzcash.com.pk)