JazzCash (Private) Limited Customer Privacy Notice

JazzCash (Private) Limited ("JCPL") commitment is unwavering in providing innovative products and services that foster financial inclusion throughout the country, especially for the underserved population.

To provide customers with lending services and products, we need to collect certain personal details. Without this information, we are legally restricted from offering the desired products and services. For the purpose of providing lending services, JCPL may need to collect and use information, including but not limited to details related to the customer's bank account, deposit/deposit certificate or any instrument reflecting financial offerings made by JCPL.

Our utmost commitment is to ensure the protection of your privacy, placing it at the forefront of our priorities. Our collection of personal data is directed towards enhancing the quality of services we offer you. Personal data includes any information directly or indirectly related to you. This privacy notice outlines our privacy policy and our handling of your personal data, which includes why we collect it, the types of data we collect, how we process it and how you can manage, correct and/or delete/erase your personal data.

It is important to note that specific information may be added to this document, when necessary, especially in the context of particular services or business engagements. Additionally, JCPL shall digitally make available dedicated privacy notices to its users, where applicable.

In instances where JCPL determines the purpose and methods of processing personal data, we take on the role of a data controller. If we operate as a processor while delivering services to a customer, we undertake the processing of your personal data in compliance with the relevant laws of Pakistan. We will assist the data controller in fulfilling data subject rights as required by the law, when applicable.

What Personal Information We Collect?

The personal information we collect, particularly in respect of your bank account, adheres to applicable laws of Pakistan, including but not limited to the Microfinance Institutions Ordinance, 2001, Prudential Regulations for MFBs, AML/CFT/CPF Regulations, Branchless Banking Regulations, and any other SBP and/or SECP instructions/circulars, as well as per JCPL's policies. It is also contingent on the JCPL products and services you use and subscribe to.

We collect the following personal information:

- Your name, date and place of birth, mother's maiden name, biometrics,CNIC, profession/occupation, source of income, and contact details, including your physical address, email address, and phone number.
- Information obtained from credit bureaus and your NADRA verification record.
- Customer KYC/CDD Details & Financial Profile, including but not limited to information obtained from credit bureaus, NADRA verification record, operating instructions, transaction data, title of Account, and customer account balance.
- Additional information needed for product/service delivery or response to inquiries.
- Preferences for products, services, or lifestyle activities.
- Additional information provided directly through our websites or indirectly through online presence.
- Information provided through customer surveys.

How We Collect Your Personal Information?

We protect this information according to the practices described in this privacy notice, plus any additional restrictions imposed by the source of information. It is vital to note that these sources may vary over time.

We collect your personal information when you:

- make a borrowing from us - online, over the phone, or elsewhere.
- sign up or inquire about becoming a JCPL customer

- participate in market research
- file a complaint with us via any physical or digital channel.
- participate in surveys, promotions, contests, or prize draws.
- make changes to or close your JCPL linked account
- visit our website, or apps
- submit content, including photographs, or comments to participate in discussion threads
- sign up for a service with us that necessitates us verifying your information with credit reference and fraud prevention agencies, and/or NADRA.
- apply for a job with us directly or via a third party.

Information we collect automatically:

- Your interactions with our emails and texts.
- Details of your interactions with our customer service, such as the date, time and reason for contacting us, transcripts of any chat conversations.
- Device IDs or other unique identifiers.
- Information collected via the use of cookies, web beacons and other technologies, including ad information (such as information on the availability and delivery of ads, the site URL, as well as the date and time).

We also obtain Information from other sources:

- IP addresses, device IDs or other unique identifiers, as well as associated pre-paid promotion, billing and user interface information.
- Security service providers that provide us with information to secure our systems, prevent fraud and help us protect the security of our Company's accounts.

Why We Collect Your Personal Information:

We collect and utilize customer information for various purposes, aiming to provide a seamless banking experience and enhance our services. The primary reasons include:

Provision of Banking Services and Products:
- Ensuring customers have access to a wide range of banking services and products.

Communication and Notifications:
- Contacting customers about changes to our products or services.
- Managing customer accounts.
- Sending transactional messages/intimations via customer accounts.
- Sending account statements.
- Sending OTPs regarding the confirmation of service/actions carried out from customer accounts.
- Cascading awareness messages.

Market Analysis and Research:
- Conducting market analysis and research.
- Developing our products and services.
- Understanding how customers use our products and services on an anonymous or personal basis.

Customer Engagement:
- Contacting customers about our products and services, including marketing these products.
- Conducting internal investigations related to crime and fraud prevention, detection, recovery, or prosecution.

Direct Marketing Communications:
- Sending direct marketing communications and information about our products, services, and special promotions.
- Providing offers or promotions based on how customers use our products and services.

- Sharing information about other companies' products and services that may interest customers (if chosen to receive this information).

These communications may be transmitted through various channels, including telephone, post, fax, and any form of electronic message (including email, IVR, SMS, MMS, etc.).

How we seek your Consent?

Our website always has the latest version of our Customer Privacy Notice, and significant updates to this notice (as required by law and regulations) will be communicated to all customers via SMS or via digital channels. A hyperlink to this Customer Privacy Notice is included in all agreements with corporate clients. By accepting the Privacy Notice, you expressly agree to JCPL'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 to private credit bureaus, JCPL's authorized partners, vendors, suppliers or service providers

How we use your information?

We at JCPL initially use your personal information and/or data to improve our products and services, ensuring your privacy is protected. We anonymize and aggregate the 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 anonymized insights with third parties, ensuring that no personal information is disclosed. 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 our policy.

This means using your information to:

- manage and help you manage your account
- sort out a payment, put your payment order through our system or send you a payment order
- to communicate with you i.e. to respond to communications, reach out to you about your transactions or account, market our products and services, provide other relevant information, or requestion information or feedback.
- analyse markets, write reports or carry out research and number crunching. And, where the law allows observe information related to you (including the calls you make, your spending, what you use the internet for and where you are when you do it)
- ensure security and prevent fraudulent activity i.e. to protect individuals, employees and our company.
- manage our network and your use of our network
- look into any complaints or concerns you may raise
- check whether you qualify for credit or other products, services and offers. We use automated systems to analyse your information to help us make fair and objective decisions about whether we can give you (and members of your household) credit, credit-related services, other similar facilities, or insurance. As part of this we may also need to check the financial status of people connected to you (e.g., your spouse or other family members)
- trace and recover debts, manage credit, detect, and prevent fraud and money laundering.
- recover any outstanding payments you may owe us

Or 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
- use various communication methods such as phone, email, post, text, picture message, online banner advertising, or other means to provide you with 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, and we will stop sending you messages if you unsubscribe from the service. You can modify your marketing preferences anytime by utilizing the link provided or short code in any marketing communication you receive
- inform you of offerings from other companies that we believe may appeal to you or allow chosen third parties to directly inform you about their products and services

We are allowed to utilize and share your information for the following purposes:

- to meet the terms of our agreement with you and provide you with our products and services and manage your account
- to comply with legal and regulatory obligations, such as preserving call records for a specific period
- to meet our legitimate business interests, including direct marketing, market research, fraud, and money laundering prevention to mitigate credit and fraud risks and safeguard our business
- when you have given your permission for us to use your data for certain purposes
- in the event of an emergency where we perceive a potential danger to you or others
- when you have obtained permission from any third parties whose personal or sensitive information you have provided to us in connection with JCPL's products and services (such as JCPL's insurance), allowing us to receive and handle that information for those purposes

We do not use or disclose sensitive personal date for any purposes that would require a user to exercise a right to limit processing. We retain your personal information/data only for so long as necessary to fulfill the purposes for which it was collected, including as described in this privacy notice. We will retain your personal data for the period necessary to fulfill the purposes outlines in this privacy policy and our service specific privacy summaries. 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.

Who We Share Your Information With?

- **With Securities and Exchange Commission (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 State Bank of Pakistan (SBP) in the format prescribed by SBP from time to time. This sharing also extends to the inspection of the books and records.
- **With Credit Bureaus**: Personal information is shared with Credit Bureaus in accordance with the Credit Bureaus Act of 2015.
- **With Auditors:** Information is provided to our auditors for the purpose of auditing the bank's 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 courts as required by law.
- **With Service Providers and Business Partners**: Personal information may be shared with service providers and business partners as per applicable agreements.
- **With Group Entities, Affiliate Bodies and Subsidiaries**: in compliance with applicable laws, when necessary.

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 law or 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 use 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.

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.

Information Sharing

We may share your data with third parties, specifically for credit referencing. Additionally, 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.

What is our Retention Period?

We may retain information as required or permitted by applicable laws and regulations, including to honor your choices, for our billing or records purposes and to fulfill the purposes described in our policy. Specifically, we retain information for our legitimate interests and essential business purposes, such as operating, maintaining and improving our services; complying with our legal obligations; and exercising our legal rights and remedies, including enforcing out terms of use.

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

However, records can be retained for longer period, if required by any other law or where transaction and or relationship relate to any investigation, litigation, or required by Court of law or any other competent authority.

Other Important things to know

How we use cookies?

What are your policies on cookies and tracking technologies?

We use cookies and web beacons to collect information about how you use our online products and services, which helps us make them more relevant to you. 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 web and mobile applications is not covered in this document. JCPL 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 JCPL being a party unless explicitly mentioned otherwise.

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

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

JCPL is dedicated to preserving the confidentiality of personal information in accordance with legal and regulatory requirements, as evidenced by its policies and procedures. Upholding privacy conditions and requirements is an essential aspect of JCPL'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 measures to ensure the security of your information.

What security measures are in place to protect personal data?

The security of your personal information is a top priority for us. We take all necessary measures to ensure that your personal information is securely stored and protected from unauthorized use, access, modification, or disclosure. This commitment includes both physical and electronic security protocols.

- JazzCash has recently achieved compliance with the ISO 27001:2022 standard, ensuring the implementation of all applicable controls.
- Access controls are in place to prevent unauthorized access.
- Relevant cryptographic controls have been implemented by the application owner as needed.
- Secure coding practices, a mandatory control of ISO 27001, are strictly followed.
- Access to personal data is granted based on the principle of least privilege and need-to-know basis.

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

What are the rights of individuals regarding their data?

At JCPL, 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. Personal data shared with JCPL is essential to our customers, and you have the right to access your data and request information pertaining to you. All access requests will be handled in accordance with regulatory requirements and your legal rights.

In some instances, we may also provide your information directly to regulatory authorities or in compliance with the law.

How We Handle Data Breaches

At JCPL, 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 and industry best practices.

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

Contact us

If you have any other questions about your privacy, feel free to call Customer Care on following numbers and address:

- Jazz Cash Helpline: 4444
- Jazz Cash Complaints Email: complaints@jazzcash.com.pk
- Only for Privacy related issues: [insert relevant POC/DPO’s email]

- **List of Name of our offered services** (list all digital apps with urls)
  - Jazzcash
    (www.jazzcash.com.pk)