# KwanzaPay Privacy Policy

Effective Date: November 7, 2024

### Introduction

KwanzaPay Limited ("KwanzaPay," "we," "us," or "our") values and prioritizes the privacy of our users. This Privacy Policy outlines how we collect, use, store, and protect your information when you interact with our website, mobile applications, APIs, or any KwanzaPay services (collectively, the "Services"). We are committed to protecting your privacy and handling your data with transparency and care.

### **Information We Collect**

### Personal Information

When you create an account or use our services, we collect information necessary to verify your identity, provide our services, and comply with regulatory requirements. This includes your full legal name, date of birth, residential address, government-issued identification, and contact information such as email address and phone number. For enhanced services or merchant accounts, we may require additional documentation such as proof of address, source of funds, or business registration documents.

### **Financial Information**

To facilitate transactions and provide our services effectively, we collect and maintain various financial details. This includes your bank account information, payment card details, mobile money accounts, cryptocurrency wallet addresses, and complete transaction history. We also collect relevant documentation for regulatory compliance, such as financial statements and source of funds verification.

### Service Usage Information

We automatically collect information about how you interact with our platform. This includes device information (such as IP address, browser type, and operating system), access times, pages viewed, and feature usage patterns. We also gather location information based on your IP address and, with your permission, may collect precise location data to provide location-based services.

### **Transaction Information**

When you use our Services, we collect detailed information about your transactions, including cryptocurrency transfers, trades, and fiat currency conversions. This encompasses transaction amounts, timestamps, wallet addresses, exchange rates, and associated metadata required for transaction processing and record-keeping.

### How We Use Your Information

#### **Core Service Provision**

We use your information to provide and improve our services, process transactions, maintain your account, and ensure platform security. This includes facilitating cryptocurrency trades, managing wallet services, processing payments, and maintaining transaction records. Your information helps us personalize your experience and optimize our platform functionality.

### Security and Compliance

Your information is essential for maintaining platform security and meeting regulatory requirements. We use it to verify your identity, prevent fraud, monitor suspicious activities, and comply with anti-money laundering (AML) regulations. This includes transaction monitoring, risk assessment, and maintaining required compliance records.

#### Communication

We use your contact information to send important updates about your account, transaction confirmations, security alerts, and platform announcements. You may also receive service-related communications, technical notifications, and customer support responses. While we may send marketing communications, you can opt out of these at any time while continuing to receive essential service notifications.

#### **Platform Improvement**

Information about how you use our services helps us improve platform functionality, develop new features, and enhance user experience. We analyze usage patterns, performance metrics, and user feedback to optimize our services and identify areas for improvement.

# Information Sharing

We maintain strict controls over how your information is shared and never sell user data to third parties. Information sharing occurs only in specific circumstances:

### Service Providers

We may share information with trusted service providers who assist in operating our platform, including identity verification services, payment processors, and security providers. These partners are contractually bound to protect your information and can only use it for specified purposes.

### Legal Requirements

We may share information when required by law, including responses to legal requests, court orders, or regulatory requirements. This includes reporting obligations to financial regulators and cooperation with law enforcement investigations when legally required.

#### **Business Transfers**

In the event of a merger, acquisition, or sale of our assets, user information may be transferred as part of the transaction. We will notify users of any such change in ownership or control of their personal information.

### **Data Protection**

We implement comprehensive security measures to protect your information, including encryption, access controls, and regular security audits. Our security infrastructure includes multi-factor authentication, sophisticated monitoring systems, and secure data storage protocols. We regularly review and update our security practices to maintain the highest standards of data protection.

# **Data Protection Measures**

We maintain robust security infrastructure to protect your information throughout its lifecycle. This includes enterprisegrade encryption for data storage and transmission, multi-layer firewalls, and comprehensive intrusion detection systems. Our security protocols are regularly audited and updated to address emerging threats and maintain industry best practices.

# Your Privacy Rights

As a KwanzaPay user, you have specific rights regarding your personal information. You may request access to your personal data, obtain a copy of your information, or correct inaccuracies in your records. You can also request deletion of your data, subject to our legal retention requirements and ongoing service obligations. We facilitate these rights through straightforward processes accessible through your account dashboard or our support channels.

### International Data Transfers

KwanzaPay may transfer your information to servers and service providers located in different countries. When we engage in such transfers, we implement appropriate safeguards to protect your information, including standard contractual clauses and data processing agreements. We ensure that any international transfer complies with applicable data protection laws and maintains adequate security measures.

### **Data Retention**

We retain your information for as long as necessary to provide our services and comply with legal obligations. For active accounts, we maintain records throughout the account lifetime plus additional periods required by law. After account closure, we retain necessary information for legal compliance, fraud prevention, and audit purposes, typically for a period of five to seven years, depending on regulatory requirements.

### **Cookie Usage and Tracking**

Our platform uses cookies and similar technologies to enhance user experience and platform functionality. Essential cookies enable core features such as authentication and security. We also employ analytical cookies to understand user behavior and improve our services. You can manage cookie preferences through your browser settings, though disabling certain cookies may limit platform functionality.

### **Children's Privacy**

KwanzaPay services are not intended for individuals under 18 years of age. We do not knowingly collect or maintain information from minors. If we become aware that a user is under 18, we will take steps to remove their information and terminate their account.

# **Changes to Privacy Policy**

We may update this Privacy Policy to reflect changes in our practices or for legal compliance. Significant changes will be communicated through email notifications and platform announcements. Continued use of our services after such changes constitutes acceptance of the updated policy. We encourage users to review the Privacy Policy periodically to stay informed about our privacy practices.

### **Marketing Communications**

While we may send promotional communications about our services, you have control over these communications. You can opt out of marketing messages while continuing to receive essential service notifications. Management of communication preferences is available through your account settings or by contacting our support team.

### **Contact Information**

For privacy-related inquiries or to exercise your privacy rights, please contact our Data Protection Officer at dpo@kwanzapay.com. For general privacy questions or concerns, you can reach our support team at privacy@kwanzapay.com. We strive to respond to privacy requests promptly and typically process inquiries within 30 days.

# **Jurisdictional Considerations**

KwanzaPay complies with privacy regulations in all jurisdictions where we operate. Users in specific regions may have additional rights or protections under local law. We adapt our privacy practices to meet these requirements while maintaining consistent protection standards across our platform.

Our commitment to privacy extends beyond regulatory compliance to include industry best practices and user trust. We regularly review and enhance our privacy measures to provide secure and transparent services to our global user base.

KwanzaPay Limited Email: privacy@kwanzapay.com Website: www.kwanzapay.com (http://www.kwanzapay.com)

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