

d.light LTD Privacy Policy

d.light Limited is committed to protecting and respecting our customers privacy. Data privacy laws vary greatly from country to country and, in some countries, are non-existent. Consequently, d.light has adopted legislation such as the EU General Data Protection Regulations (“GDPR”) and the UK Data protection Act 2018. Personal Information processed by d.light in any location is subject to the local requirements applicable in the specific location, the GDPR and the UK Data Protection Act 2018, where applicable. These requirements apply even if local data privacy laws are less stringent or where there are no local data privacy laws. Where local law has stricter requirements then these must be met in addition to those in this Policy.

Scope of policy

This privacy policy (Policy) together with our Terms of Use and Customer Contracts as set out at <https://www.dlight.com/tnc> and any additional terms of use applies to your use of:

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1. d.light PayGo mobile application software (hosted on the Google Play Store (App Site), once you have downloaded and installed the App onto your mobile telephone or handheld device (Device).
2. Any of the services accessible through the App (Services) or those available on the App Site or other sites of ours or other third-party Sites (Service Sites).

This policy sets out the basis on which any personal data iswe collected 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 downloading the App, you confirm that you have read, understood and accept the terms of this Policy set out hereunder. You also consent to the collection, use, storage, processing and disclosure of your personal information in the manner set out in this Policy.

A. Information we may collect about you (Submitted Information):

This may include information provided by:

- i. ~~provided by~~ filling in forms in the App or on the App Site (together Our Sites);
- ii. ~~provided by~~ filling in a physical d.light customer registration form;
- iii. ~~provided by~~ corresponding with us (for example, by e-mail or chat);
- iv. ~~provided by~~ downloading or registering the App, subscribing to any of our Services (such as applying for product financing), searching for an app or Service, sharing data via the App's social media functions, entering a competition, promotion or survey, and reporting a problem with the App, our Services, our App Site or any of Our Service Sites.

This information may include your name, ID Number, address, e-mail address and phone number, the Device's phone number, SIM card details, age, username, password and other registration information, financial and credit information (including your mobile money account details, bank account details, and bank verification number, where applicable), personal description and photograph.

B. Information we may collect about you and your device.

Each time you use our Apps we may automatically collect the following information:

- i. Technical information, including the type of mobile device you use, unique device identifiers (for example, your Device's IMEI or serial number), information about the SIM card used by the Device, mobile network information, your Device's operating system, the type of browser you use, or your Device's location and time zone setting (Device Information);
- ii. Information stored on your Device, including contact lists, call logs, SMS logs, Facebook friends, contact lists from other social media accounts, photos, videos or other digital content (Content Information);
- iii. Data from your use of any other third-party application on the Device or the Service Sites; and
- iv. Details of your use of any of our Apps or your visits to any of Our Service Sites; including, but not limited to, traffic data, location data, weblogs and other communication data (Log Information).

C. Location Information

We may also use GPS technology OR other location services to determine your current location.

D. ~~Withdrawal of Consent~~

You can withdraw your consent to our collection, processing or use of **any of the ~~this~~** information at any time by logging out and uninstalling the App from your Device.

~~D.E.~~ Information from Third Parties

Due to the nature of the Services which we provide, we are required to work with a number of third parties (including credit reference agencies and mobile money/network providers) and we may receive information about you from them.

~~E.F.~~ Unique Application Numbers

When you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

~~F.G.~~ Tracking and Cookies

We may use mobile tracking technologies to distinguish you from other users of the App. This helps us to provide you with a good experience when you use the App.

~~G.H.~~ How we use your information

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this Policy for as long as it is combined.

Information collected by us shall be used for the purpose of determining whether or not to provide product financing to a customer, the product you qualify for and the amount of product financing and conditions applicable to the financing. Your information can also be used to monitor and predict your payment behavior once you acquire a product.

I. Disclosure of your Information

We may disclose some or all of the data we collect from you when you download or use the App to credit reference bureaus.

We may disclose your personal information to any member of our group, which means our subsidiaries, affiliates, our holding company and its subsidiaries.

We may disclose your personal information to third parties:

- i. in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- ii. if d.light or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- iii. if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request; and/or
- iv. in order to: enforce our Terms and Conditions and other agreements or to investigate potential breaches; report defaulters to any credit bureau; or for the purpose of publishing statistics relating to the use of the App, in which case all information will be aggregated and made anonymous.

J. Storage of your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside your country of origin. It may also be processed by staff operating outside your country of origin who work for us or for one of our suppliers. These staff members may be engaged in the fulfillment of your requests. By submitting your Personal Data, you agree to this transfer, storing or processing of data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and all applicable laws. We may also disclose your data to anyone we consider necessary in order to provide you with services in connection with an account.

Where we have given you (or where you have chosen) a password or PIN that enables you to access our App and Sites, you are responsible for keeping this password confidential. We ask you not to share ~~your~~ password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to Our Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent _____ unauthorized _____ access.

2.1. Your Rights

We will use your data for the purposes of compiling statistics relating to our user base or customer contracts portfolio and may disclose such information to any third party for such purposes, provided that such information will always be anonymous.

Should we wish to use your information for marketing purposes, we will inform you prior to such use. You shall be entitled to prevent such usage by informing us, within 10 days of being informed of the proposed use, that you do not wish to disclose such information. You can also exercise the right at any time by contacting us at support@dlight.com

2.2. Changes to Privacy Policy

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate, notified to you when you next start the App or log onto one of the Service Sites. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services. In any event, by continuing to use the App or any Services after the posting of any changes, you confirm your continuing acceptance of this Policy together with such changes, and your consent to the terms set out there in [in](#).