

Privacy Policy

Effective Date: June 1, 2025

VISACREDIT TECH Benin (“Visacredit Tech”) places great importance on the protection of your privacy. Visacredit Tech, a Limited Liability Company (“We”) is responsible for the processing of your personal data.

This **Privacy Policy** (hereinafter referred to as the “**Policy**”) is an informational document that outlines the types of personal data we collect, how we use it, and how we process, store, and potentially share it.

This document applies uniformly to all products and services of **VISACREDIT TECH Benin** and **VISACREDIT TECH Inc.** (including the website www.visacredit.info, all services accessible from this website, and its iOS and Android mobile applications downloaded to your mobile terminal), with the understanding that additional information may be provided or requested when you subscribe to a particular product or service.

In this Policy, the terms “You,” “Your,” or “Client” refer to you.

By accepting this Policy, you explicitly consent to the collection and processing of your personal data both in Benin and abroad (France, USA), and to the sharing and storage of your data in countries with similar legal guarantees for personal data protection.

1. What categories of information do we collect?

If you are a Visacredit Tech client

We collect and use your **personal data**, i.e., any information, regardless of format (including images), relating to an identified or identifiable individual either directly or indirectly via an identification number or one or more elements specific to their identity (physical, physiological, genetic, mental, cultural, social, or economic).

This includes any information that can identify you either directly or indirectly, and that is necessary for providing you with high-quality personalized products or services.

Depending on the product or service used, the categories of personal data we may collect include:

Direct collection information

- **Identity data** (e.g., full name, place/date of birth, photo, ID/passport number, gender, age)
- **Contact details** (e.g., personal or business email address, phone number)
- **Digital activity** (e.g., IP address, website browsing, geolocation)
- **Authentication/login data** (e.g., access to your Visacredit Tech account)
- Data from your interactions with us, our Customer and Sales Service, our website, our mobile application, our social media pages (e.g. messages, emails, calls, etc.)
- **Financial/tax-related data** (e.g., country of tax residence)
- **Transaction and banking data** (e.g., payment card, mobile money, bank details)
- **Employment/income data** (e.g., occupation, source of income)
- **Geolocation data** (e.g., location of residence)
- Any other data necessary to assess your risk profile or support financial inclusion

We do not collect sensitive data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, or biometric/genetic data.

Indirect collection information

Visacredit Tech may also collect your personal data indirectly from trusted third-party partners to enhance its database or verify your information:

- publications and databases made accessible by official authorities (official journal), our partners, service providers, and suppliers, payment initiators, commercial intelligence agencies, institutional and public organizations combating fraud, money laundering, and the financing of terrorism, in compliance with data protection regulations, websites or social media pages containing information you have made public, media and databases made public by third parties.

Subject to regulatory authorization, Visacredit Tech may collect information about you that is considered sensitive by law. This includes:

- Your health data;
- Your filiation data (identity of parents, if applicable, the identity of spouses and descendants, and the number of children);
- Your National Social Security Fund (CNSS) number;
- Your data relating to criminal offenses or convictions and related security measures (criminal records);

We never process data relating to racial or ethnic origin, political opinions, religion, philosophical beliefs, or trade union membership, or the genetic data of our employees.

2. For what purposes and on what legal basis do we use this data?

Below, we describe the various legal bases on which Visacredit Tech relies for the processing of your personal data and the corresponding purposes.

1. Our processing purposes regarding customers

Visacredit Tech primarily processes your data for the following purposes:

- Providing customer services and operational management,
- Customer relationship management,
- Compliance with legal and regulatory obligations, detailed below,
- Data transfer management,
- Financial and accounting management

A.1. Complying with our legal and regulatory obligations We use your personal data to fulfill various legal and regulatory obligations, namely:

- Anti-money laundering and the financing of terrorism
- Compliance with applicable legislation regarding international sanctions and embargoes
- Fraud control, tax audit and reporting obligations
- Compliance with banking and financial regulations of the WAEMU area, under which we must, for example:
 - Identify and Know Your Customer (KYC)
 - Control and report risks to which Visacredit Tech may be exposed
 - Monitor the customer's financial operations and transactions
 - Respond to official requests from duly authorized public or judicial authorities.

A.2. Execute the contract concluded with you

We use your personal data to execute the contract and the General Terms and Conditions of Use you have signed, as well as to better manage our relationship with you, including to:

- Subscribe to products and services distributed by Visacredit Tech,
- Communicate with you: we use your information to respond to you when you contact us, to inform you of our terms and conditions and regulations, to send you marketing communications, and to tell you about our services,
- Manage and deliver Visacredit Tech products and services
- Ensure the security of the services on our platform that you use.

If you would like more information about this process, you can contact us at atcontact@visacredit.info or compliance@visacredit.info

- To respect your choice when we have asked for your explicit consent for specific processing:

In certain cases, your consent is necessary for us to process your data, including:

- To collect your feedback. We use your personal data to ask you about your perception of our brand or your expectations in terms of offers and services.
- To discuss opportunities with you. If you have expressed interest, we may use your personal data to discuss opportunities with you or connect you with partners and offer you services that we cannot currently offer.

Please note that when we process your personal data based on your consent, you can revoke your consent at any time.

3. Who can this information be shared with?

1. If you are a Visacredit Tech customer

Visacredit Tech shares or may share your personal data, subject to what is permitted by applicable regulations:

- **To the internal departments and services of Visacredit Tech**
- **To the Visacredit Tech Group and its companies**

We share information with suppliers and service providers who collaborate with us, in particular for the execution of various processes for the verification of identity and compliance of the Customer file upon account creation, to provide us with various technical infrastructures and host our systems, for the management of the Customer relationship and to offer you a support service, and to conduct various surveys and studies. These partners must adhere to confidentiality obligations in accordance with this Data Use Policy and the contracts we have signed with them.

- **To partners, financial, judicial and regulatory authorities, state agencies and public bodies.**

These data sharings are carried out at their request and within the limits of what is permitted by Beninese regulations.

- **To technological partners:**

These data sharing activities are carried out with partners with whom we have a contractual relationship for technological and communication reasons. These partners comply with personal data protection obligations in accordance with current regulations and in accordance with the contracts we have signed with them.

4. Does Visacredit Tech store your personal data in Benin?

Yes. Visacredit Tech is a company incorporated under Beninese law and complies with Beninese regulations regarding the protection of personal data. Therefore, your personal data is primarily processed and stored in Benin.

5. Can your personal data be processed, shared and stored abroad?

Some of our partners are either located abroad or have data centers outside of Benin. To fulfill their obligations to Visacredit Tech, these partners may process and store your data outside of ECOWAS in countries that offer the same guarantees and protections regarding personal data protection.

Visacredit Tech also shares your personal data with its partners located abroad (particularly in France and the USA), on the understanding that these countries offer guarantees for the protection of personal data and that Visacredit Tech has completed all regulatory formalities for the transfer of personal data outside of ECOWAS.

6. How long do we keep your personal data?

1. If you are a Visacredit Tech customer

You acknowledge that the information, including your personal information, and your documents or their reproductions will be recorded and stored for a period of ten (10) years by Visacredit Tech. Visacredit Tech retains your personal data for 10 years in accordance with applicable laws and regulations, its operational requirements and constraints, such as maintaining our accounts, effective management of the Customer relationship, as well as to assert legal rights or respond to requests from regulatory bodies.

7. What are your rights and how can you exercise them?

In accordance with applicable regulations relating to the protection of personal data, you have various rights, namely:

- **Right of access and information**

You can obtain information regarding the processing of your personal data and a copy of this personal data.

- **Right of rectification and updating**

If you believe that your personal data is inaccurate or incomplete, you can request that this personal data be amended accordingly. You may, by providing proof of your identity, request Visacredit Tech to, as appropriate, rectify, complete, update, lock or delete your personal data concerned, which is inaccurate, incomplete, ambiguous, outdated, or whose collection, use, communication or retention is prohibited.

- **Right to digital oblivion and erasure**

You can request the deletion of your personal data to the extent permitted by regulations.

- **Right of inquiry**

You may request the restriction of the processing of your personal data. For Customers, this applies to processing that is not essential to the performance of the contract provided for in the general terms of use.

- **Right to object**

You may object to the processing of your personal data, for reasons relating to your particular situation. You have the absolute right to object to the processing of your personal data for commercial prospecting purposes, including profiling related to such prospecting.

- **Right to information**

You have the right to know whether or not personal data concerning you is being processed. The right to information about your personal data applies to both the collection and use of data.

If you wish to exercise any of the rights listed above, please contact us at atcontact@visacredit.info or compliance@visacredit.info, including a scan or copy of your proof of identity with your request.

8. How will you be informed of changes to this Personal Data Information Document?

In a world of constant technological evolution, Visacredit Tech reserves the right to modify this privacy policy at any time. We regularly update this information document on our application and website. You will be informed of the updated privacy policy through our usual communication channels. Using our various services after this notification will constitute your acceptance of said changes.

9. How do we protect your personal data?

As Data Controller, and given the nature of the data and the risks associated with processing, we take all necessary precautions (both technological and legal) to:

- Preserve the security of your data;
- Prevent it from being distorted or damaged;
- And prohibit access by unauthorized third parties
- Appoint an approved Data Protection Officer

10. How to contact us?

• You are a Visacredit Tech client

You can independently exercise your rights of access, rectification, deletion, data portability, limitation of processing and control of your consents on your account. If you have any other questions regarding the use of your personal data covered by this document, you can contact us by email at the following address: compliance@visacredit.info

• You are a collaborator among our partner companies or suppliers

To exercise your rights of access, rectification, deletion, portability, limitation of processing and withdrawal of your consent, or if you have any other questions regarding the use of your personal data covered by this document, you can contact us by email at the following address: contact@visacredit.info or compliance@visacredit.info

• If you are a potential future Client or partner, you can contact us by email at the following address: compliance@visacredit.info