

# Privacy Notice (“Notice”)

## 1.0 INTRODUCTION

Yabx Technologies Limited (hereafter referred to as Yabx” “we” “our” “us) is Incubated by Comviva, a global leader in mobile financial services, Yabx is a part of the \$21 billion Mahindra Group. Yabx aims at simplifying financial access to over two billion unbanked customers in the emerging markets of Africa, Asia, and Latin America, via the mobile phone device.

Yabx provides financial control and choice to the under-served. The company leverages technology and analytics to reduce the cost of delivering financial services, thereby bringing banking services to the unbanked. Led by a team of industry experts and entrepreneurs, Yabx currently operates out of The Hague, New Delhi, Cape Town and Nairobi.

Yabx collects information that you provide to us or that we learn about you (a “User”, “you” or ‘your”) from your use of our website(s) including, without limitation, <https://Yabx.co> (the “Site”), as described in this Notice. We are committed to protect any personal information (“Personal Information”) (as described in section 4.1 below) that you provide when you are using the Site. We want our services to be safe and secure for our Users. Uniform practices for collecting, using, disclosing, storing, retaining, disposing, accessing, transferring or otherwise processing such information assists Yabx to process Personal Information fairly and appropriately, disclosing it, using it and/or transferring it only under appropriate circumstances. This Notice relates to our use of any Personal Information we collect from you for providing information related to our mobility solutions and services in the Site.

This Notice tells you how we use your Personal Information collected through the Site. Please read this Notice before using the Site or submitting any Personal Information. This Notice will be updated upon any changes in information collection, activities performed or applicable regulations. You are encouraged to review the Notice whenever you visit the Site to make sure that you understand how any Personal Information you provide will be used.

## 2.0 PURPOSE

The purpose of this Notice is to highlight various obligations, best practices and tools that support compliance with data privacy regulations applicable to Yabx in its role as a data controller or data processor and your consent for such activities.

## 3.0 APPLICABILITY

This Notice is applicable to this Site and not necessarily to other Yabx sites on the World Wide Web. When leaving this Site, please read the privacy policy applicable to the site you are visiting. If you do not agree with this Notice, please do not use this Site. The Notice considers the rights and obligations under the data protection laws applicable to the User / if the User is an EU resident, then as set forth in the EU General Data Protection Regulation (Regulation (EU) 2016/679, (“GDPR”).

## 4.0 COLLECTION AND USE OF INFORMATION

### 4.1 Collection of your information

Yabx collects, processes, and retains information about you when you visit the Site. You may voluntarily choose to provide us with Personal Information, such as your name, email address, company information, street address, telephone number, or other Personal Information, to access

protected information on the Site or so we can follow up with you after your visit. Personal Information may include, but is not limited to:

- i. Your name and physical address, email addresses, and telephone numbers
- ii. Behavioural or demographic attributes, when tied to personal identifiers
- iii. Previous Employment Detail
- iv. Employment records
- v. Full face photos and comparable Image

#### 4.1.1 Children

No information may be submitted to Yabx by persons under the age of 17 without the consent of a parent or legal guardian, nor may persons under the age of 17 make purchases or other legal acts on this Site without such consent. Yabx encourages all parents or guardians to instruct their children in the safe and responsible use of their Personal Information while using the Internet. Yabx will not knowingly collect or use any Personal Information collected from children for any purpose whatsoever.

## 4.2 How we use your Personal Information

Any information we collect from you may be used in one of the following ways:

- i. **To provide employment related services:** We shall process your personal data for financial, accounting, payroll and compensation, rewards and re-imbusement benefits, succession and resource planning in relation to employment related services.
- ii. **To gather details about prospective employees:** Your information helps us to more effectively respond to your requests and queries to make the job application interface user friendly.
- iii. **To send periodic emails:** The email address you provide will be used to send you information and updates pertaining to employment / job openings within Yabx.
- iv. **Select content, improve quality and facilitate use of the other interface channels:** Yabx may use your Personal Information to help create and personalize content on our channels, facilitate your use of the channels (for example, to facilitate navigation and the login process, avoid duplicate data entry, enhance security, improve quality, track campaign and survey responsiveness and evaluate page response rates).
- v. **Obtain Third Party Services:** We also share Personal Information and other information with third parties who provide services to Yabx for website management, information technology and related infrastructure provision, e-mail delivery, auditing, and other similar services. When Yabx shares Personal Information with third party service providers, we require that they use your Personal Information to contact you about a Yabx offer in support of your business needs or to conduct online surveys to understand better the Users' needs and profiles. This is only for the purpose of providing services to us and subject to terms consistent with this Notice.

## 5.0 FAIRNESS AND PURPOSE

Yabx will collect adequate, relevant and necessary Personal Information, and will process such information fairly and lawfully for the purpose it is collected. The purpose of collection will be specified not later than at the time of data collection, or on each occasion of change of purpose.

## 6.0 ACCURACY OF INFORMATION

The information held by Yabx on the Site shall be checked with you from time to time to ensure that it remains up-to-date. Should your personal circumstances change, you should notify us and update your details by logging in with your credentials or by writing to us at [dpo@comviva.com](mailto:dpo@comviva.com) immediately.

## 7.0 DISTRIBUTION OF INFORMATION

### 7.1 Information Disclosure

Yabx does not share, sell, rent, or trade Personal Information collected through its Site with third parties for their sole promotional purposes or otherwise than as outlined in this Notice. Yabx may share information with third party service providers contracted to provide services on our behalf for processing to provide your employment related services and benefits and other business purposes. These third-party service providers may only use information we provide to them as requested and instructed by Yabx.

- i. Yabx may disclose your Personal Information as we believe to be necessary or appropriate:
  - a. under applicable law, including laws outside your country of residence;
  - b. to comply with legal process;
  - c. to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes;
  - d. to enforce our terms and conditions; and
  - e. to allow us to pursue available remedies or limit the damages that we may sustain.
- ii. Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer the Personal Information we have collected to the relevant third party. A prominent notice will appear on our Site for 30 days after any such change in ownership or control of your Personal Information.
- iii. We may share information with (a) governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when:
  - a. permitted or required by law; or,
  - b. trying to protect against or prevent actual or potential fraud or unauthorized transactions; or,
  - c. investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes, and

(b) external advisors acting as processors (e.g. lawyers, accountants, auditors etc).

### 7.2 CROSS-BORDER DATA TRANSFERS

When conducting business, working on Yabx projects, or implementing new processes or systems, an operation may require the transfer of Personal Information to other Yabx entities or third parties that are located outside of the Yabx operation's country of business. While permissible data transfer mechanisms are defined by applicable law or regulation, examples include:

- i. A data transfer agreement with the Yabx entity or third party who will access or obtain the Personal Information;
- ii. Notice to and/or approval from a country's local data protection authority; or
- iii. Notice to and/or consent from the individual whose data is to be transferred.

## 8.0 CONSENT AND CONTROL

### 8.1 Consent

Consent is an individual's choice to "opt-in" or "opt-out" of the Company's use of Personal Information and is usually obtained by a "check box" or signature confirming the individual understands and agrees to the processing of their Personal Information. By clicking on "I agree" , you hereby consent to the following:

- i. Collecting, using, or processing your Personal Information, including sensitive Personal Information, in certain ways or sharing the individual's Personal Information with any third party;
- ii. Transferring your Personal Information outside of your country of residence;
- iii. Using or placing web cookies on your computer or other electronic devices.

### 8.2 CONTROL OF YOUR INFORMATION

Yabx also provides individuals with the right to control their Personal Information, which includes the right to access, rectify, modify, erase, restrict, transmit, or object to certain uses of their information and right to ask us to provide you your Personal Information which you have provided to us in a structured, commonly used and machine-readable format.

You may request to review, correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through the Site, or object to the use or processing of such Personal Information by us. You have the ability to update your information at any time. To change this information, please login and go to "update my profile". If you have questions about your account or are having trouble accessing your account, please contact us at "<https://Yabx.co/contact>" or e-mail us on "[dpo@comviva.com](mailto:dpo@comviva.com)".

In your request, please make clear what Personal Information you would like to have changed, or suppressed from our database or what limitations you would like to put on our use of your Personal Information that you have provided to us.

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within thirty (30) days.

## 9.0 DATA STORAGE

Your Personal Information will be retained in a form which enables Yabx to identify the individual for no longer than it is necessary for the purposes for which the data was collected and used. Your Personal Information may be retained in certain files for a period of time as required by applicable law and following Yabx's data retention policies in order to comply with such financial or legal requirements, to properly resolve disputes or to troubleshoot problems. If you wish to cancel your account or request that we no longer use your Personal Information to provide you services, contact us via the information above. We will respond to your request to access or delete your information within thirty (30) days.

Yabx shall retain your Personal information only as long as necessary for the fulfilment of the stated purposes, and shall be disposed thereafter. We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your Personal Information to provide you services, contact us via the modes mentioned

in section 8.2 above. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements

## 10.0 COMMITMENT TO DATA SECURITY

Your Personal Information is kept secure. Only authorized employees, business partners, clients, vendors and other third-party providers (who have agreed to keep information secure and confidential) have access to it.

Yabx ensures that our suppliers employ industry standard security measures to ensure the security of information through legally binding terms and conditions. However, Users of our Site are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of any Yabx websites. Access to and use of password protected and/or secure area of the Site is restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

### Use of cookies

Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, e-mail address when you are logged-in to your e-mail from the browser you are using, time spent on the online services, pages visited, including the Site, referring URL, language preferences, and other aggregated traffic data.

We collect and store information when you visit the Site, and this may include using cookies or similar technologies to identify your browser or device. We use cookies to collect and store information when you interact with services we offer to our partners. Our analytics product helps to personalize your experience while using the online services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the online services or to send you advertisements and marketing emails. You can configure your browser to refuse cookies, or to warn you before a cookie is placed. If you disable cookies, some parts of our Site may not function properly or at all.

**Transfers outside EEA.** If you are resident of the EU / EEA:

Yabx transfers Users Personal Information outside of the country where the Users are located. Some recipients of their Personal Information are located in another country for which the European Commission has not issued a decision that this country ensures an adequate level of data protection, namely India.

By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EU and/or 2004/915/EC) as referred to in Art. 46 (5) GDPR or other adequate means, which are accessible by sending a request to [dpo@comviva.com](mailto:dpo@comviva.com), we have established that all other recipients located outside the EEA will provide an adequate level of data protection for the Personal Information and that appropriate technical and organizational security measures are in place to protect Personal Information against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer (including to our affiliates outside the EEA) is subject to appropriate onward transfer requirements as required by applicable law.

## 11.0 REVOCATION OF CONSENT

Your consent to your Personal Information collection and processing may be revoked by notifying us via our contact page. For users below the age of 17, the consent should be provided by the holder of parental responsibility of the child.

Please note, in case you choose to not provide us with the consent or withdraw the consent at any given point of time, we shall not be able to provide the services as detailed in section 4.2 of this Notice.

## 12.0 YOUR RIGHTS

Under the conditions set out under applicable law, you have the following rights:

1. The right of access

You have the right to obtain from us confirmation as to whether or not Personal Information concerning you is being processed, and, where that is the case, to request access to the Personal Information. The access information includes – inter alia – the purposes of the processing, the categories of Personal Information concerned, and the recipients or categories of recipients to whom the Personal Information have been or will be disclosed.

You have the right to obtain a copy of the Personal Information undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.

2. The right to rectification

You have the right to ask us to rectify any inaccurate Personal Information concerning you.

3. The right to erasure

You have the right to ask us to erase your Personal Information.

4. The right to restrict processing

You have the right to request the restriction of processing your Personal Information. In this case, the respective data will be marked and may only be processed by us for certain purposes.

5. The right to data portability

You have the right to ask us to provide you your Personal Information which you have provided to us in a structured, commonly used and machine-readable format. You also have the right to transmit your Personal Information to another entity without hindrance from us.

6. The right to object

You also have a right to object to us processing your Personal Information in certain circumstances. However, such a right to object may not exist in certain situations, for e.g. if the processing of your Personal Information is necessary to take steps prior to entering into a contract or to perform a contract already concluded or if the Personal Information is relevant to a legal dispute then we may not stop processing your Personal Information.

7. In case of complaints you also have the right to lodge a complaint with the competent supervisory authority appointed under applicable law, or if you are an EU resident, the member state of your habitual residence for the alleged breach.

### 13.0 PRIVACY CONTACT INFORMATION

If you have any questions regarding our Notice or if you need to update, change or remove information, you can do so by contacting us on <https://Yabx.co/contact/> or by an email addressed to: [dpo@comviva.com](mailto:dpo@comviva.com)

### 14.0 CHANGES

We reserve to right to change, modify or withdraw access to this Site, or the content of these pages at any time. We recommend you regularly review this Notice.

### 15.0 DISCLAIMER

Yabx assumes no responsibly or liability for any errors or omissions in the content of this site. This website is provided "as is" and Yabx does not expressly or impliedly warrant, guarantee or make any representations concerning the use, results of use or inability to use or access the information or contents of the Website, in terms of the accuracy, reliability, completeness, functionality, performance, continuity, timeliness or otherwise, fitness for a particular purpose and/or non-infringement

This web site may be accessed from third party links over which Yabx has no control. Yabx does not make any warranties or representations of any kind as to the accuracy, currency, or completeness of any information contained in those third-party and external sites and shall have no liability for any damages or injuries of any kind arising from such content or information.

YABX CONFIDENTIAL