

Title: Privacy Notice

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Reviewed and Approved

Name	Approving Authority	Signature

Change History

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1. Introduction

Faym Capital Limited ("Faym," "we," "us," or "our") is a platform that provides loans to individuals, and small businesses.

This Privacy Notice ("Notice") governs your use of our website and services. We provide this Notice because you have a right to know what information we collect, why we collect it, how it is protected and used, and the circumstances under which it may be disclosed.

2. Terms of Use

You are required to comply with the provisions of our [Terms of Use](#) in relation to the information provided.

3. The data that we process

Personal data means any information about an individual from which that person can be directly or indirectly identified. We do not consider personal data to include information made anonymous so that it does not identify a specific user.

Concerning our services, we process personal information from you to contact or identify you, deliver and retrieve assets such as laptops to you as may be directed by your company, and some information may be collected automatically for our website to function properly. We also collect personal data through your use of our services, such as when you sign up or register for any of our services. We collect the following information:

Service users	Visitors
Full name	IP address
Email address	Data and time of visit to our website
Phone number	Browser type
Gender	Browsing behaviour
Date of Birth (D.O.B)	
Nationality	
Credit score	
Credit history	

Business contact address	
Personal contact address	
Bank account number	
Bank statement	
Name of next of kin	
Phone number of next of kin	
Marital status	
Guarantor's full name	
Guarantor's phone number	
Guarantor's contact address	
Relationship between the customer and Guarantor	
Employment record	
Source of income	
IP address	
Data and time of visit to our website	
Browser type	

4. Managing cookies and tracking settings

Our website uses cookies and other tracking technologies, and information about their usage is specified in our Cookies and Tracking Technologies Notice.

You may adjust your browser or operating system to restrict the usage of tracking technologies. You may also select your cookie preference by following the prompt on the cookie banner. However, when you limit the usage of tracking technologies on your browser, you may be restricted from using certain features on our websites. Please note that our system may not respond to Do Not Track requests or headers from some or all browsers.

5. Lawful bases for processing data

We are required to process your data under at least one of these lawful bases, as specified under the relevant data protection laws:

- **Legitimate interest:** Processing your data is necessary for our legitimate interests or the legitimate interests of a third party, unless our legitimate interests are outweighed by your interest, in which case we may not rely on this lawful basis.
- **Consent:** You have given explicit consent for us to process your data for a specific purpose.
- **Contract:** If the data processing is necessary for a contract with us or because you have asked us to take specific steps before entering that contract.
- **Legal obligation:** If the processing of your data is necessary where there is a statutory obligation on us.

6. Purpose of Processing Your Data and the Lawful Bases

Purpose of Processing	Lawful Bases
<ul style="list-style-type: none"> ▪ To help us develop, improve, customise, or restructure our services. ▪ To inform you whenever there are changes to our terms of business or services. ▪ To take statistical data and analytics for our internal use. ▪ To analyse site usage and provide, maintain, and improve the content and functionality of the website. ▪ To assess your credit worthiness as a customer. ▪ To facilitate the recovery of loans advanced to you as a customer. 	Legitimate interest
<ul style="list-style-type: none"> ▪ To send marketing or promotional messages to you. 	Consent
<ul style="list-style-type: none"> ▪ To secure your data ▪ To conduct our Know-Your-Customer (KYC) process. 	Legitimate interest, legal obligation

<ul style="list-style-type: none"> ▪ To send you service-related messages. ▪ To manage your account. ▪ To facilitate the delivery of our service to you. <ul style="list-style-type: none"> ▪ To enforce our terms of service and any terms and conditions of any other agreements for our services. ▪ To communicate with you and ensure user support. ▪ To address your inquiries, process registration, and complete transactions. 	<p>Contract</p>
<ul style="list-style-type: none"> ▪ To interact with regulatory authorities or other public authorities concerning you. 	<p>Legal obligation</p>

7. Your Rights as a Data Subject

You are vested with certain rights as a data subject. They include the right to:

- a. access personal data we hold about you by requesting a copy of the personal data we hold about you;
- b. rectify such information where you believe it to be inaccurate;
- c. restrict the processing of your data in certain circumstances;
- d. object to the processing of your data where we intend to process such data for marketing purposes;
- e. where feasible, receive all personal data you have provided to us—in a structured, commonly used, and machine-readable format—and transmit the information to another data controller;
- f. request the erasure of your data (also known as the right to be forgotten);
- g. withdraw your consent to processing your data;
- h. lodge a complaint with the regulatory authority where you have reason to believe that we have violated the terms of this Notice. (You may complain or seek redress from us within 30 days from when you first detected the alleged violation.)

You may seek to exercise any of the above rights by emailing us at privacy@ibm.com.

9. Who do we disclose data to?

We may share your data with third parties. When using our website, we share your data with the following third parties:

Third Parties	Purpose of data sharing
Paystack	We use Paystack to facilitate the payment of requested loans and to serve as a payment channel for the repayment of loans. You can read Paystack's privacy notice here .
Credit Bureau	We use credit bureaus to determine your credit-worthiness as a customer.
Identity verification platforms	We use these platforms to verify your identity during your onboarding on our platform.
Acquiring companies	Your data may be shared with an acquiring company in the event of a sale, merger, or acquisition of our company.
Legal and regulatory authority	We may disclose your personal information if we believe it is reasonably necessary to comply with a law, regulation, order, subpoena, audit, or to protect any person's safety or to address fraud, security, or technical issues.

10. Retention of your data

The personal data we process will be stored for as long as necessary to fulfil the purposes described in this Notice. However, we will also retain data subject to relevant provisions of applicable laws, resolve disputes, prevent fraud and abuse, and enforce our legal agreements and policies. In addition, we delete your data for targeted marketing purposes once you unsubscribe from our marketing communications.

Please note that your data may be retained for a longer period, notwithstanding your request to remove it, where there is a legal requirement to do so.

11. Security of data

We prioritise your privacy and use advanced measures to protect your data. While no online platform is entirely foolproof, we are dedicated to safeguarding your information against loss, misuse, and unauthorised access. If a significant breach occurs, we will promptly inform you and act swiftly to address it.

12. International transfer of data

We transfer personal data outside our country of operation. We ensure any cross-border data transfers adhere to all necessary data protection regulations. This means that before transferring personal data, we either confirm that the recipient country has robust data protection laws or, if not, employ specific contractual terms and other safeguards to protect the data. In cases where the destination country might not meet stringent data protection standards, we will leverage the relevant data transfer mechanism or obtain your consent before proceeding and inform you of any risks. Should you wish to learn more about how we ensure data protection during these transfers, details will be provided upon request.

13. Marketing and communications

We only send marketing communications to you with your consent. You can opt-out of our marketing or object to further processing by clicking on the 'unsubscribe' button at the bottom of the page.

14. Complaints

If you have any inquiries or complaints, please contact our Data Protection Officer (DPO) at []. Our DPO will examine your concerns and update you on the resolution process.

15. Changes to this Notice

We update our privacy notice occasionally. We will notify our users when we make a change, and visitors will know this by checking the last date of the update on this page whenever they visit.

16. Contact Us

If you have any questions relating to this Notice, your rights under this Notice, or you are not satisfied with how we manage your personal data, kindly contact our Data Protection Officer at []

This privacy notice is effective from []