

## 1. Privacy Policies

- *What data and how is collected and used*

“Iman Pay” app collects following user’s data:

- Phone number
- Passport or ID card
- Selfie
- Payment plastic cards

The process of data collection includes registration steps where users add personal data after accepting the “Public offer” which includes “Privacy policy” rules by using OTP in the app.

Collected data is sending to governmental credit organizations which could score users for checking their creditworthiness. Also, user’s data (namely, selfie) is compared with local authority’s database for users’ identification.

- SMS

We plan to collect users’ SMS for conducting behavioral scoring for checking their creditworthiness. Received information assists us to check our potential customers in more details before providing them financing aid that can improve our installment portfolio.

Such data collection should be also approved by customers. They can accept our “Public offer” which includes “Privacy policy” rules by using OTP in the app. Without users’ acceptance we do not use their personal data for scoring.

- *Confirmation of using SDKs*

The data collected is shared with selected and authorized providers of data analytics services. The service providers are described below:

### 1. AppMetrica.

“Iman Pay” app uses the service for marketing purposes.

### 2. CredoLab Pte Ltd.

“Iman Pay” app uses Credolab services as part of our decision process to assess your creditworthiness for a “Iman Pay” with us. We may also use your data to assess your interest in receiving financial services through algorithms and mathematical modelling.

Metadata accessed, collected and shared are as follows:

- Media
- Contacts
- Audio
- Calendar
- Reminders

We collect data of your phone to provide a segmented risk profile and generate an aggregated statistical information. To protect your identity, we remove all personal identifiers (if any) and pseudonymize such information. Any metadata processed in this way cannot be used to reproduce the original data collected. Credolab's privacy policy is available at the following link: <https://www.credolab.com/privacy-policies/gdpr-privacy-policy>.

- *Explanation of data retention/deletion policies*

According to our retention policy, collected data is retained until we get response from organizations which provides information about the users' creditworthiness.

With respect to our deletion policy, we provide two options for users of app "Iman Pay": log out from the app and delete their account. First option allows users to leave the account which is created in the app. If users choose the second option, all personal information of users with their account is deleted automatically from our system.

## 2. Permission

- *Request of permissions*

Before starting the registration process, user is asked to provide permission for collecting their personal information for scoring. Users should be familiarized with "Public offer" document and accept it. This document includes information of "Privacy Policy" rules which are also accepted by users. After receiving the permission from user for collecting their personal information, registration process is started.

- *Functionality for withdrawing the consent*

Users of "Iman Pay" cannot withdraw their consent for collection of personal information because we are financial organization which is needed sensitive information of our users for checking their creditworthiness. When users accept "Public offer" we start automatically to collect data for providing limit which can be used by users for purchases in installments. If users do not agree with collection of their information they reject "Public offer" and do not register in the app.

### 3. Data Minimization

“Iman Pay” app asks an access only to “Camera” and “Contacts” apps which are essential for core functionality of the app. Access to “Camera” is needed for taking a selfie in the app. “Contacts” is used for adding friends’ contracts in the app. It’s important for users who can take a participation in the referral system.

### 4. Access

“Iman Pay” app does not ask an access for unnecessary data from the user’s device. It respects user’s permissions and use only access which is essential for core functionality of the app.

### 5. Account Sign-In

“Iman Pay” app includes account-based features. Therefore, the process of users’ sign-in is crucial for the core functionality of the app. Here, we provide our users’ option to delete their account if they do not want to hold it. Account deleting functionality is placed in app’s “Settings” near the “Log out” button.

### 6. Apps for discovering the passwords

It’s restricted in our company to use developers’ apps for discovering the passwords of users.

### 7. SafariViewController

SafariViewController is used to visibly present information to users.

### 8. Collection of personal information

“Iman Pay” app collects personal information of users after receiving the acceptance of “Public offer” by users. Acceptance of this document means that users allow to collect their personal information for scoring. Our company restricts to collect users’ personal information without their explicit consent.

### 9. Legal entity submits user information

“Iman Pay” app provides financial service that’s specialized as highly regulated field. Therefore, user information is submitted by a legal entity providing services, not by our developers.

### 10. Request of basic contact information

“Iman Pay” app requests basic contact information from users as their phone number.