

Berhan Bank Digital Lending Privacy Policy

Last updated: October 08, 2026

This Privacy Policy describes our policies and procedures on the collection, use, and disclosure of your information when you use the Berhan Bank Digital Lending Service and tells you about your privacy rights and how the law protects you. It should be read together with the Berhan Bank Cash Loan, Digital Salary Advance and Education financing loan Terms & Conditions, and the Berhan mobile application terms you accepted when opening your account.

We use Your Personal Data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique Berhan Bank account created for you to access the Service or parts of the Service.
- **Application** refers to the Berhan Bank white label mobile application, including its USSD channel, through which the Digital Lending Service is provided by the Company.
- **Company** (referred to as either "the Company", "the Bank", "We", "Us" or "Our" in this Policy) refers to Berhan Bank S.C., Addis Ababa, Ethiopia.
- **Country** refers to Ethiopia.
- **Credit Reference Bureau** means any licensed credit information sharing entity to which Customer loan information may be disclosed.
- **Credit Scoring** means the evaluation of a loan applicant based on personal characteristics, historical financial data, account transactions, and past credit behavior.
- **Device** means any device that can access the Service such as a cellphone or a digital tablet.

- **Digital Lending Service or Service** refers to the Berhan Bank digital loan products offered through the Application, including the Cash Loan and the Digital Salary Advance (DSA).
- **KYC** means the customer identification and verification requirements applicable to the Service.
- **NBE** means the National Bank of Ethiopia, the regulatory authority governing financial institutions and digital financial services in Ethiopia.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service Provider** means any natural or legal person who processes data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used. This includes the Company's digital financial services technology partner and credit scoring solution provider.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **You** means the individual accessing or using the Service, or the legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our Service, We may ask you to provide us with, or We may obtain from the sources described below, certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- First name, middle name and last name
- Phone number linked to Your Account
- Berhan Bank account number
- KYC verification data

Employment and Income Data (Digital Salary Advance)

If You apply for a Digital Salary Advance, We may collect and process:

- Employer name and the association between You and Your employer, as derived from the Bank's records
- Employment status and length of service

- Salary and payroll payment history
- Basic salary information used to determine Your eligible loan amount

Financial, Transaction and Credit Data

To assess eligibility, determine loan limits, and manage your loan, We may collect and process:

- Account balances, transaction history, income inflows and account activity (including e-money activity)
- Credit Scoring results and score history
- Loan application details: amount requested, tenure selected, approval or rejection decisions
- Disbursement, repayment, fee, penalty and outstanding amount records
- Repayment behavior and any default status
- Records of information obtained from or reported to Credit Reference Bureaus

Usage Data

Usage Data is collected automatically when using the Service.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever You visit Our Service or when You access the Service by or through a mobile device.

Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect, with your prior permission:

- Information regarding Your location
- Information from Your Device's phone book (contacts list)
- Pictures and other information from Your Device's camera and photo library

We use this information to provide features of Our Service, to verify your identity, to prevent fraud, and to improve and customize Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on your device.

You can enable or disable access to this information at any time through Your Device settings. Please note that disabling some permissions may limit your ability to use certain features of the Service or to qualify for a loan.

Sources of Your Personal Data

Besides the information you give us directly, you authorize us to collect and verify your information from:

- Berhan Bank's core banking system (CBS) and Your Account records, through secure API integration
- The National ID Service, telecom operators, and local administration, for identity and KYC verification
- Your employer or payroll records held by the Bank, in the case of the Digital Salary Advance
- Credit Reference Bureaus and other authorized sources
- Our credit scoring engine, which generates scoring results from the data above

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain Our Service**, including to monitor the usage of Our Service.
- **To manage your Account**: to manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- **To verify your identity and meet KYC requirements**: to confirm that you are eligible for the Service, including age (18 or above) and active Account status.
- **To assess eligibility and make credit decisions**: to carry out automated Credit Scoring, determine whether you qualify for a loan, and determine your loan limit, tenure and applicable pricing. Customers whose credit score is below the minimum required for a product are not eligible for that product.
- **For the performance of a contract**: to disburse loans, calculate and collect facilitation fees, daily fees, penalties and other charges, process repayments, and administer any other contract with Us through the Service.
- **To collect repayments**: including voluntary repayment, automatic deduction from Your e-money or Berhan Bank accounts as described in the applicable Terms & Conditions, and recovery of overdue amounts.
- **To contact You**: by email, telephone calls, SMS, USSD, or other equivalent forms of electronic communication, such as the Application's push notifications, regarding

repayment reminders, due dates, updates or informative communications related to the functionalities, products or contracted services, including security updates, when necessary or reasonable for their implementation.

- **To provide you with news, special offers and general information** about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about, unless you have opted not to receive such information.
- **To manage your requests and complaints:** to attend to and manage your requests to us.
- **To prevent fraud and manage risk:** to detect, investigate and prevent fraud, misuse and abuse of the Service, and to monitor portfolio performance and default.
- **To comply with the law:** including NBE directives, credit reporting obligations, and requests from courts and mandated government organs.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about Our Service users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of Our promotional campaigns, and to evaluate and improve Our Service, products, services, marketing and Your experience.

Automated Decision-Making

Loan approvals, rejections and loan limits under the Service are generated through an automated Credit Scoring solution based on Your KYC, account, transaction, income and repayment data. If You believe a decision was made on inaccurate data, You may contact Us as described in the Contact Us section and ask for Your information to be reviewed.

Sharing Your Personal Information

We may share your personal information in the following situations:

- **With Credit Reference Bureaus:** We may disclose, receive, record and use information relating to Your Digital Loan Account to and from licensed Credit Reference Bureaus, including your loan, repayment and default information.
- **With regulators, courts and government organs:** including the NBE, courts of law, and mandated government organs, as required by law or regulation.
- **With Service Providers:** We may share your personal information with Service Providers to operate the Application and credit scoring solution, to monitor and analyze the use of Our Service, and to contact you.

- **With identity and data verification sources:** such as the National ID Service, telecom operators and local administration, to verify the information you provide.
- **For debt collection:** if a loan becomes overdue and remains unpaid, We may use Your residential or business address, and may transfer Your personal data to a third party (such as a law firm, attorney or individual) involved in debt collection, as described in the applicable Terms & Conditions.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With business partners:** We may share your information with our business partners to offer you certain products, services or promotions.
- **With other users:** when you share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose your personal information for any other purpose with your consent.

We do not sell Your Personal Data.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, banking record-keeping requirements set by the NBE and other applicable laws), resolve disputes, and enforce our legal agreements and policies. Loan and repayment records may be retained for the period required by applicable law even after Your Account is closed or your loan is fully repaid.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. This means that this

information may be transferred to, and maintained on, computers located outside of your region or country where the data protection laws may differ from those of your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and that no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of Your data and other personal information, and in line with NBE directives and applicable Ethiopian law.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law Enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other Legal Requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Your Rights and Choices

Subject to applicable law and the Bank's regulatory obligations, you may:

- Ask to access the Personal Data We hold about you.
- Ask us to correct Personal Data that is inaccurate or incomplete.
- Withdraw your permission for location, contacts, camera or photo access at any time through Your Device settings.
- Opt out of promotional messages at any time.
- Request a review of an automated credit decision.
- Request deletion of Your Application user account (see below). Deletion is subject to our legal obligation to retain certain banking and loan records, and you must first settle any outstanding loan amount.

You may also raise a complaint with the Bank through the Customer Contact Center. If you are dissatisfied with the response, you may refer the matter to the National Bank of Ethiopia.

Security of Your Personal Data

The security of Your Personal Data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

You are responsible for keeping Your PIN confidential and for safeguarding your mobile device and SIM card. We recommend enabling Device security features, changing Your PIN regularly, and reporting any loss or theft of Your SIM card or Device to the Bank promptly. Berhan Bank will never ask you to share Your PIN.

Children's Privacy

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If we become aware that we have collected Personal Data from anyone under the age of 18, we take steps to remove that information from our servers.

Links to Other Websites

Our Service may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page, on the Berhan Bank website or notice board, and/or through a prominent notice on the Application, prior to the change becoming effective, and We will update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. Your continued use of the Service after a change takes effect constitutes your acceptance of the updated policy.

Account Deletion Requests

Please use the following email addresses to send your request to have Your Berhan Bank digital lending user account deleted:

- info@berhanbanksc.com

Governing Law

This Privacy Policy is governed by the laws of the Federal Democratic Republic of Ethiopia, the directives of the National Bank of Ethiopia, and the relevant procedures of Berhan Bank.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- 8292:
- info@berhanbanksc.com
- berhanbankapp.com@gmail.com