

# Privacy Policy

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## Shuleni App

Online School Application, Registration  
and Student Progressive Report

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## 1.0 Introduction:

ALITA BA COMPANY LIMITED is a limited company licensed in Tanzania. ALITA BA offers diverse range of tech solutions to companies, and public institutions and the general public.

Our company has developed an edtech solution that is called SHULENI APP. This solution involves students from age 9 years, parents and other stakeholders including schools and booksellers.

In offering our products and services, and interacting with various stakeholders, we collect two personal data which is **mobile phone number** that is used to authenticate user, data processing and prevent collection of information that will not be useful in our system (garbage data).

Privacy matters to us, ALITA BA is committed to comply with the Personal Data Protection Act, 2022 and best practices relating to personal data privacy and protection, in all our operations.

The purpose of this declaration is to show how we collect, use, store, make available, disclose, update, safeguard, destroy your personal data and your rights relating to the privacy of your personal data and how you can exercise them.

## 2.0 The data that ALITA BA collects and process

SHULENI App collects some personal data and data that will be used within the application in order to suffice smooth operation of the software. The **personal data** we collect include but not limited to

- (i) Parent and student names
- (ii) Phone number
- (iii) Name of the school that a student is studying
- (iv) Class/grade of a student

The **organizational data** that we display in the app include but not limited to

- (i) School name, location, type, registration number, ownership and level
- (ii) School contacts: P.O.BOX, Phone number and email address
- (iii) Previous school results
- (iv) Academic information such as subjects taught, curriculum and combinations offered.
- (v) Fee structure
- (vi) Images and photographs of schools and their students
- (vii) Images and photographs of books

## 3.0 How do we collect personal data

Parent name (username) and phone number is captured when a person

downloads the app and starts to use it for the first time. The process is done by sending a special key to the registered number so as to be sure of the authenticity of the number registered.

Other students data will be collected when a student registers for quizzes and tests where specifics are needed so that a student that is doing the test may be easily identifiable.

#### 4.0 How do we collect organizational data

By organization we mean schools and bookshop that display their information in SHULENI App platform.

Organization data is collected using forms which are filled by school administrator into our system. This can be done by the organization personnel or third party that is working with us.

#### 5.0 When and how we use cookies?

When you visit, browse, or use our website and mobile applications, we use cookies to automatically collect certain information from your device. We use such information, where relevant, for internal analysis and troubleshooting, to recognize you and remember your preferences, to improve the quality of and to personalize our content.

#### 6.0 Why do we collect personal and organizational data?

We will process your personal data for any of the reasons outlined below;

- (i) Providing products and services to you that involve executing transactions, administering claims where applicable, collecting payments due to us by you, managing our risks and maintaining our overall relationship with you.
- (ii) Communicating with you regarding the products or services we offer
- (iii) Providing you with further information that you request from us regarding the products or services we offer.
- (iv) Maintain, monitor, improve and develop our business policies, systems and controls
- (v) Maintain and improve data quality.
- (vi) Design, develop and test products, services and solutions for clients, which may include combining sources and types of personal data
- (vii) Personalize and customize products, services and solutions, messaging and advertising;
- (viii) Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement
- (ix) Manage business emergencies and stress events

- (x) Process and settle transactions and payments;
- (xi) Meet record-keeping obligations.
- (xii) Conduct research and analysis (among other things, to assess product suitability and to conduct behavioral profiling.
- (xiii) Statistical purposes, such as market segmentation or customer segments (that is placing customers in groups with similar customers based on their personal data;
- (xiv) Enable clients to use value-added solutions and participate in reward credit models and tools and to obtain related information
- (xv) Enforce and collect on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing the customer, or to institute legal proceedings against the customer
- (xvi) Achieve other related purposes.

## 7.0 Consent

In addition to the reasons for personal and organizational data processing, we will process your personal data where we have your specific consent for a defined purpose. We will also seek your consent where applicable laws require it.

## 8.0 Where will we process your personal data?

We will process your personal information in Tanzania or where our third-party service providers operate. We will only process and transfer personal information to countries that we are satisfied that they will provide adequate data protection, and we will ensure our third-party service providers comply with the minimum data protection standards as required by ALITA BA.

## 9.0 When and how we process personal data of children?

A child is any person below the age of eighteen (18) years. ALITA BA will process personal data of children if one or more of the following applies:

- (i) Parent or legal guardian of the child has explicitly consented to processing of personal data for the purpose of accessing our services
- (ii) The processing is necessary to comply with legal or regulatory obligation
- (iii) The child's personal data was made public by the child's parent or guardian.

## 10.0 How do we use your personal data for direct marketing?

Whether you are an existing client or a prospective client with whom we have had previous interactions in respect of your need for consultation of educational matters and therefore we would like to share information about our products, services, and special offers with you.

If you are a prospective client, and we have had no previous interaction or have no relationship with you, we will seek your express consent in compliance with the data protection laws to market to you electronically.

If you no longer wish to be contacted for marketing purposes, you can withdraw your consent or opt out of direct marketing at any time by contacting the us.

## 11.0 When do we use automated decision making?

An automated decision is made when individual's personal data is analyzed without human intervention in that decision-making process.

We may use the personal data we collect to conduct data analytics, including profiling and behavioral analysis, to make

quicker automated decisions in our business operations and to evaluate your personal characteristics to predict outcomes and risks. We require that rules followed by such automated systems are designed to make fair and objective decisions. We may use artificial intelligence and machine learning to help improve our communications and client experience, make our business operational processes safer and more efficient and enable us to provide faster responses and improve turnaround time. We may use automated decision-making for the following:

- (i) Know-Your-Customer (KYC) checks by verifying the authenticity of scanned identification documents and a photo through biometric facial recognition and liveness check
- (ii) Operational efficiency -- voicebots for call center identification verification;
- (iii) Client engagement -- client marketing campaigns and communications to recommend more tailored products and services based on insights from your personal data and your interactions with robo advisors and chatbots

For further information on your rights in relation to automated decisions that affect you, please refer to the '[What rights do you have?](#)' section.

## 12.0 When how and with whom will we share your personal data?

In general, ALITA BA will only share your personal data if any one or more of the following apply

- (i) You have consented to it
- (ii) if the law requires it or
- (iii) If it is necessary to protect or pursue legitimate interest of the customer, company or third party

We take extra care when we transfer or share data and will enter suitable contracts with the trusted parties with whom we share your data, thus ensuring your rights under relevant data protection legislation are upheld.

## 13.0 Are your personal data transferred to other countries?

We will only transfer your personal data to third parties in another country in any one or more of the following circumstances:

- (i) Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- (ii) Where the transfer is necessary to enter into, or perform, under a contract with you or a contract with a third party that is in your interest.

(iii) Where you have consented to the transfer and/or

(iv) Where it is not reasonably practical to obtain the customer's consent, but the transfer is in your interest.

This transfer will happen within the requirements and safeguards of applicable laws or privacy rules that are binding to ALITA BA. Where possible, the party processing your personal data in another country will agree to apply the same level of protection as available by law in Tanzania, or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.

## 14.0 How is your personal data protected?

The security of your personal data matters to us, and we take reasonable steps to keep your personal data safe and to prevent loss, destruction of and damage or unlawful access to your personal data by unauthorized parties. We take appropriate and reasonable technical and organizational steps to protect your personal data in line with industry best practices. ALITA BA's security measures include physical, technological and procedural safeguards. This includes the following: -

- (i) Keeping systems secure (such as monitoring access and usage);
- (ii) Storing records securely;
- (iii) Controlling the access to our premises,
- (iv) Systems and/or records; and
- (v) Safely destroying or deleting records.

We require the same level of security to be implemented by our service providers and other third parties. However, you must not share or send us any personal data through unauthorized channels, as these are not a secure way of communication and carry a risk of interception and unauthorized access. You should only share personal information through our authorized channels.

### 15.0 How long do we retain your personal data?

We retain your personal data no longer than necessary in line with our legal and regulatory obligations and for our business and operational purposes as highlighted above.

We have records management policy with duration of retention periods of information we hold. We will delete, anonymize, destroy and/or stop using personal data when we no longer need them in line with the legal or regulatory requirements under strict controls.

### 16.0 What rights do you have?

Privacy matters to us, and we want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with the bank. You have the right to

#### (i) To be informed

With this Privacy notice, we inform you about what we do with your personal data.

#### (ii) Access your personal data

You have the right to check whether we hold personal data about you, and you can ask us for a copy of such data and information on how we have used it.

#### (iii) Correct your personal data

If your personal details have changed, or you believe we have incorrect or out-of-date information about you can ask us to update it.

#### (iv) Request deletion of your personal data

You can ask us to delete your personal data. However, we may need certain personal details to provide our products and services to you.

#### (v) Restrict or object to processing

You can ask us to stop using your data or change how we use it. However, we may need certain personal details to engage with you or provide our products and services to you.

**(vii) Object to automated decision making**

You have the right to reject or request for a review of a decision made solely based on an automated process if it negatively impacts you

**(viii) Data portability**

You can ask us to provide your personal data to another organization in a format that can easily be read by machines

**(ix) Complaint**

You can log your complaints in relation to our processing of your personal data through the contact details below. AND, if your complaints have not been handled to your satisfaction, you can contact the Personal Data Protection Commission (PDPC).

**(x) Not to provide consent or to change or to withdraw consent provided**

We may from time to time ask for your consent to process your personal data. You can choose not to provide such consent or let us know at any time if you change your mind about the consent already provided. However, we may not be able to provide our products and services or engage with you without certain personal data.

**(xi) Withdraw from direct marketing**

You can withdraw your consent and tell us to stop sending you direct

direct marketing at any time.

We will respond to requests to exercise your personal data rights in line with applicable laws. We will ask you to verify your identity before processing your request. If you have any questions about your rights, please contact our data protection officer (DPO) through the contact details below.

**17.0 ALITA BA's Privacy Commitments:**

Customers entrust us with their privacy – whether it's the protection of their personal information, the confidentiality of their private communications or the way we develop our products and services. The way we handle their privacy is a vital part of our responsibility to customers and how we earn their trust. We aim to create a culture at M-Pesa Limited where employees have a clear understanding of how important privacy is and how to ensure it is protected. Our Privacy Commitments set out the principles that govern our approach to privacy and how we engage with employees, partners and external stakeholders on relevant issues – such as designing products to protect privacy or assisting law enforcement.

**(i) Respect**

We value privacy because of its value to people. It's about more than legal

compliance – it's about building a culture that respects privacy and justifies the trust placed in us.

**(ii) Openness and Honesty**

We communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions.

**(iii) Choice**

We give people the ability to make simple and meaningful choices about their privacy.

**(iv) Privacy by Design**

Respect for privacy is a key component in the design, development and delivery of our products and services.

**(v) Balance**

When we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimize privacy impacts.

**(vi) Laws and Standards**

We comply with privacy laws, and we will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and

standards.

**(vii) Accountability**

We are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers.