



Redefining Digital Finance
Across Africa with Umoja Coin



PRIVACY POLICY

Effective Date: OCTOBER 2025

Building Africa's Financial Freedom with **Umoja**

Owner Of Policy: Umoja Tech Ltd, Dubai, United Arab Emirates

Applicable To: All Umoja Entities

Produced by: Compliance/Legal Department

1. POLICY STATEMENT

UMOJA Limited (hereinafter referred to as “UMOJA” or “the Company”) is committed to its obligations under the regulatory system, the General Data Protection Regulation (GDPR) and the **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data [PDPL]** and maintains a robust and structured program for compliance adherence and monitoring.

We carry out frequent risk assessments and gap analysis reports to ensure that our compliance processes, functions and procedures are fit for purpose and that mitigating actions are in place where necessary. However, we recognize that breaches can occur, so this policy states our intent and objectives for dealing with such incidents. Although we understand that not all risks can be mitigated, we operate a robust and structured system of controls, measures and processes to help protect data subjects and their personal information from any risks associated with processing data.

The protection and security of the personal data that we process is of paramount importance to us and we have developed data specific controls and protocols for any breaches relating to the EU GDPR and data protection laws.

2. PURPOSE

The purpose of this policy is to provide the Company's intent, objectives and procedures regarding data breaches involving personal information. As we have obligations under the EU GDPR and UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data [PDPL], we also have a requirement to ensure that the correct procedures, controls and measures are in place and disseminated.

3. INTRODUCTION

Umoja Tech Ltd (“Umoja Tech” “we” “our” or “us”) respects your privacy and is committed to protecting your personal data. This Privacy Policy provides a clear overview of how we handle the personal information you provide, our commitment to protecting it, and your rights and options for controlling your data and safeguarding your privacy. It details the types of personal information we collect when you visit our website, interact with our support staff or investment experts, and how we use this information. Additionally, it explains how you can contact us if you have any questions about this policy or wish to file a complaint regarding our handling of your personal information.

We process your data in accordance with applicable data protection laws, including the **UAE**

Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data [PDPL] and the **EU General Data Protection Regulation (GDPR)** where applicable, and other international standards.

4. INFORMATION WE COLLECT

We may collect the following categories of personal data:

- **Identification Data:** Full name, date of birth, nationality, government ID/passport information.
- **Contact Data:** Email address, phone number, residential address.
- **Financial & Transaction Data:** Wallet addresses, transaction history, bank/payment details for fiat on/off-ramp.
- **Technical Data:** Device information, IP address, location data (where permitted), cookies, and usage statistics.
- **KYC/AML Data:** Documents and information required to meet Know Your Customer (KYC) and Anti-Money Laundering (AML) obligations.
- **Biometric Data:** For enhanced security and compliance, we may collect biometric identifiers (such as fingerprint scans or facial recognition data) as part of the KYC onboarding process.

5. HOW WE USE YOUR INFORMATION

We are committed to protecting your personal information and will only use it in accordance with the laws and regulations applicable in your jurisdiction. This means that any collection, processing, storage, or sharing of your data will be strictly limited to what is legally permitted and necessary for the provision of our services. We will not disclose your personal information to third parties without lawful basis or your explicit consent, and we will take all reasonable steps to ensure that your data is handled securely, transparently, and in full compliance with relevant data protection frameworks. See below in details how we use your information:

5.1. Processing Your Transaction

We use relevant personal information as described above to process and complete your transaction and to notify you of its status.

5.2. Assessing Your Eligibility for Offers

We process your personal information to assess your ability to proceed with a transaction or agreement, supporting our legitimate interests in making informed decisions regarding offers. This may also help expedite future transactions.

5.3. Engaging with You Regarding Our Products and Services

Your personal information will be used to provide the products and services you have requested, conduct market research surveys, perform statistical analysis on application usage, and carry out direct marketing related to our business. We process this information when necessary to fulfill our contractual obligations.

5.4. Compliance with Legal and Regulatory Obligations

We will take all necessary steps to comply with customer instructions and legal obligations, including adherence to the **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data [PDPL]** and the **EU General Data Protection Regulation (GDPR)**, and other relevant data protection laws.

6. IF YOU FAIL TO PROVIDE PERSONAL DATA?

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to fulfil the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

6.1. Basis for Processing Your Personal Information

We will only process your personal information if:

1. You have provided consent (where required), or your organization has obtained your consent to share your information with us; or
2. We have a legitimate interest that is not overridden by your rights, freedoms, or interests.
3. If you have given express consent, we may process your personal data for additional purposes. You have the right to withdraw your consent at any time.

7. HOW IS YOUR PERSONAL DATA COLLECTED?

We collect data from you through various methods, including direct Interactions.

You may provide us with your identity, contact, and financial information using your fingerprint or communicating with our support staff at different agent points where they are strategically located or via post, phone, email, or other channels. Additionally, you might be required to fill in personal information using our digital forms. This includes personal data you share when you:

- Apply for our products or services.
- Create an account on our website.
- Subscribe to our services or publications.
- Request marketing communications.
- Participate in a competition, promotion, or survey.
- Provide feedback or contact us.

8. DATA SHARING & DISCLOSURE

We do not sell or rent your personal data under any circumstances. However, we may share your information in specific cases where it is necessary to deliver our services, comply with legal obligations, enforce our policies, or protect the rights and safety of Umoja and its users. The different cases where we might need to share details of your information include:

- With Service Providers; partners who provide compliance, payment, or technical infrastructure.
- With Regulators and Authorities; as required by law in **Dubai, the UAE**, or other jurisdictions where Umoja operates.
- With Affiliates; within the Umoja Coin group of companies, subject to strict confidentiality.
- With Your Consent; when you explicitly authorize sharing.

Regardless of how we collect your personal data, it may be shared across all our offices, as listed on our website. Each office is committed to always maintaining a standard level of data protection. In cases where we share your personal data with third parties, we will do so in compliance with applicable data protection laws and implement appropriate safeguards to ensure its security and confidentiality.

Additionally, your personal information may be transferred to countries or jurisdictions that may not offer the same level of data protection as we do. If such transfers occur, we will, where necessary, establish contractual agreements with counterparties, requiring them to uphold adequate data protection measures.

9. DATA RETENTION

We will retain your personal information only for as long as necessary to fulfil the purpose for which it was collected; the data retention period shall span up to 5-10 years in accordance with the **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data [PDPL]** and the **EU General Data Protection Regulation (GDPR)**. This includes ensuring compliance with legal, regulatory, accounting, or reporting obligations.

Once your personal data is no longer required for these purposes, or if you withdraw your consent (where applicable), we will delete it unless we are legally required or otherwise authorized to retain it.

10. INTERNATIONAL DATA TRANSFERS

As a global platform, Umoja may transfer and store your personal data in countries outside the United Arab Emirates (UAE), including jurisdictions that may not offer the same level of data protection. However, we take this responsibility seriously and implement robust safeguards to ensure your information remains secure and compliant with applicable laws. These safeguards include internationally recognized mechanisms such as Standard Contractual Clauses (SCCs), data processing agreements, and other lawful transfer protocols that uphold the integrity and confidentiality of your data. We also conduct regular assessments to ensure that our data handling practices meet the highest standards of privacy and security, regardless of where your information is processed.

11. YOUR RIGHTS

Under applicable data protection laws, you have the right to:

- Request a copy of your personal data.
- Correct any inaccuracies in your personal data.
- Withdraw consent for specific processing at any time. (without affecting prior lawful processing).

Requests can be submitted via Legal@umojacoin.com

If you withdraw your consent, we will cease processing your data for the purpose you originally agreed to, unless we have a legal basis to continue. We do not engage in automated decision-making or profiling unless legally permitted.

12. OPTING OUT

You may opt out of receiving marketing messages at any time by:

- Logging into our website and adjusting your marketing preferences.
- Using the opt-out links included in marketing communications.
- Contacting us directly via legal@umojacoin.com.

Opting out of marketing messages does not affect personal data provided to us for product or service purchases, warranty registrations, service experiences, or other transactions.

You also have the right to seek remedies for any breach of your data rights under the **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data [PDPL]**, **Nigerian Data Protection Act 2023 (NDPA)**, **Nigeran Data Protection Regulation (NDPR)**, the **Kenya Data Protection Act (DPA, 2019)** and the **EU General Data Protection Regulation (GDPR)** depending on your jurisdiction.

13. SECURITY MEASURES

We implement robust technical and organizational measures to safeguard your personal data against unauthorized access, loss, misuse, or alteration. These measures are designed to meet international standards and reflect our commitment to data security and user trust. Key protections include:

- **End-to-End Encryption:** All transactions and sensitive communications are encrypted from origin to destination, ensuring that data remains confidential and tamper-proof throughout its lifecycle.
- **Secure Infrastructure:** Our servers are hosted in environments that comply with globally recognized security frameworks, including **ISO/IEC 27001**, which governs information security management systems.
- **Multi-Factor Authentication (MFA) and Biometric Login:** Access to user accounts and administrative systems is protected by layered authentication protocols, including biometric verification and MFA, reducing the risk of unauthorized access.
- **Routine Security Audits and Penetration Testing:** We conduct regular internal and third-party audits, as well as simulated cyberattacks, to identify vulnerabilities and strengthen our defenses proactively.
- **Access Controls and Role-Based Permissions:** Data access is strictly limited to authorized personnel based on role-specific permissions, minimizing exposure and ensuring accountability.

- Incident Response Protocols: In the event of a security breach, we have established procedures for rapid containment, investigation, notification, and remediation to protect affected users and maintain operational integrity.

14. COOKIES & TRACKING

Our website and apps use cookies and similar technologies to enhance your experience. Users may control cookie settings in their browsers.

For more details, please see our [Cookie Policy](#)

15. CHILDREN'S PRIVACY

Our services are not intended for individuals under the age of 18. We do not knowingly collect, process, or store personal data from minors, nor do we support or permit the collection or uploading of information related to minors on our platform. If we become aware that such data has been submitted, we will take immediate steps to delete it and ensure compliance with applicable child protection and data privacy laws.

16. UPDATES TO THIS POLICY

We regularly review and update our Privacy Policy to ensure compliance with evolving regulations. Any updates will be posted on this web page; additionally, users will be notified of material changes via email or in-app notification.

17. CONTACT US

If you have questions or concerns about this Privacy Policy or inquiries regarding your data rights or to exercise any of your rights, please contact us via:

Umoja Tech Ltd, Dubai, United Arab Emirates: legal@umojacoin.com