



# KEEPING THE LIFELINE OPEN IN UNBANKED CRISIS ZONES

DATA PRIVACY & PROTECTION OVERVIEW





The SecureAid system is the digital enabler for the critical service that Huozhi and its licensed partners provide to aid organisations in their management of humanitarian programmes in unbanked crisis zones. The field user interface for merchants and recipients is the “Amanacard Apps” and “Amanacard”.

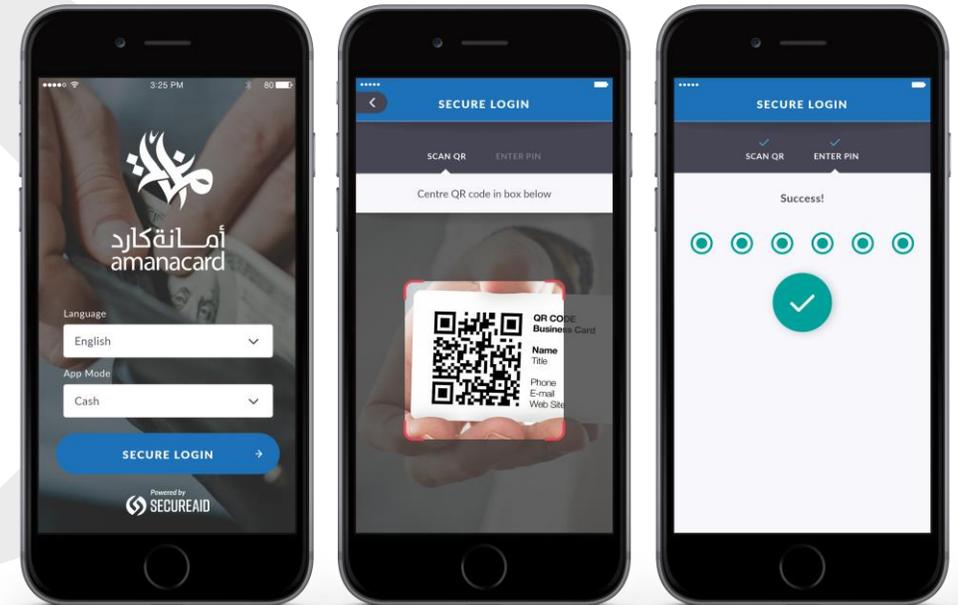
We are committed to ensuring the highest level of data protection and privacy across our platforms, constantly monitoring industry trends, assessing risk, evaluating appropriate security controls, and implementing remediation measures as appropriate.

We respect the right to privacy and the protection of personal data, and strictly follow international laws and relevant best practice.

We are registered as a “Data Controller” in the United Kingdom with the Information Commissioner’s Office (ICO) under registration number ZA344270.

We work with aid implementers who also act as Data Controllers. When we receive information from third parties, we act as “Data Processors”.

Our data protection obligations are laid out explicitly in all enforceable contract templates prepared in conjunction with leading global law firm Herbert Smith Freehills LLP.





Huozhi is signatory to the Cash Learning Partnership (CaLP) *Protecting Beneficiary Privacy: Privacy Principles and operational standards for the secure use of personal data in cash and e-transfer programmes*. However, we extend the principles to cover all stakeholders that we work with, including participating merchants, recipients and employees.

#### 1 RESPECT

We respect the privacy of all stakeholders we engage with, and recognise that obtaining and processing their personal data represents a potential threat to that privacy.

#### 2 PROTECT BY DESIGN

We “protect by design” the personal data we obtain from all stakeholders either for our own use or for use by third parties for each cash or e-transfer programme we initiate or implement alongside partners.

#### 3 UNDERSTAND DATA FLOWS AND RISKS

We analyse, document and understand the flow of personal data for each cash or e-transfer programme internally and between our organisation and partners, and we have regularly updated risk mitigation strategies to address any risks arising from these flows.

#### 4 QUALITY AND ACCURACY

We ensure the accuracy of the personal data we collect, store and use, including by keeping information up to date, relevant and not excessive in relation to the purpose for which it is processed, and by not keeping data for longer than is necessary.

#### 5 OBTAIN CONSENT OR INFORM BENEFICIARIES AS TO THE USE OF THEIR DATA

At the point of data capture, we will ensure that all data subjects are informed as to the nature of the data being collected, with whom it will be shared, whom is responsible for the secure use of their data, and be provided with the opportunity to question the use made of the data and withdraw from the programme should they not wish their personal data to be used for the purposes described.

#### 6 SECURITY

Our processes and systems comply with the highest technical and operational security standards for each stage of the collection, use and transfer of data to prevent unauthorised access, disclosure or loss and in particular any external threats are identified and actions taken to mitigate any risks arising.

#### 7 DISPOSAL

We do not hold personal data for longer than is required unless we have clear, justifiable and documented reasons for doing. Otherwise data held by us and any relevant third parties will be purged.

#### 8 ACCOUNTABILITY

We have an established mechanism whereby data subjects can request information about what personal data we hold about them, and mechanisms to receive and respond to any complaints or concerns they may have about the use of their personal data.



Huozhi is committed to ensuring that all relevant stakeholders understand their obligations and rights when using the SecureAid system. For non-English speaking audiences, we translate all documentation (terms and conditions, user agreements, FAQs, SOPs) into the local language.

In the Middle East region, the following documents and applications have been translated into Arabic:

- SecureAid Mobile App Licence Terms and Conditions (for end users)
- SecureAid Privacy Policy FAQs (for Merchants)
- SecureAid Privacy Policy FAQs (for Recipients)
- Amanacard Onboarding FAQs (for Recipients)
- Amanacard Consent Form (for all users)
- Amanacard Cash (for Cash App users)
- Amanacard Shop (for all users)

Huozhi collects and safeguards information from a combination of desk research, key informant interviews, site visits, and conversations with business people, including principal decision-makers, to create three levels of Know Your Supplier (KYS) checks for Merchants:

- (1) Basic – establishing identity
- (2) Advanced – establishing nature of business
- (3) Enhanced – deeper information and verification

All such data subjects controlled by Huozhi are cross-checked with 1,000+ sanctions lists and other official databases and blacklists using the SecureAid system.

This brings the highest reasonable standard of due diligence possible to sensitive areas, such as conflict zones, requiring the strongest data protection controls.



**SECUREAID**

**FINTECH ON THE FRONTLINE**