



AFR

Website Privacy Notice



ACCESS TO FINANCE RWANDA

Website Privacy Notice

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Versions Control

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1. Introduction

At **Access to Finance Rwanda** (hereafter “**AFR**”, “we”, “us”, or “our”), we are dedicated to safeguarding the privacy of our suppliers, service providers, visitors, website users, project beneficiaries and financial grantees in compliance with the Rwanda N° 058/2021 of 13/10/2021 Law relating to the protection of personal data and privacy and applicable data protection legislation (“RDPA”).

This notice applies where we are acting as a data controller with respect to the personal data of our website users, project beneficiaries and financial grantees. As a data controller, we determine the purposes and means of processing personal data.

2. Personal Data We Collect

The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.

The types of personal data that are collected may include:

Categories of personal data	Details
Contact details	Name, Address, Telephone number, Email address
Individual details	Gender, Date of Birth
Identification details	ID number
IT and IS Information	URL data, Web analytics data
CCTV Footage	Video recordings
Sensitive personal data	Sex desegregation, Disability Information
Other personal data	Residential Location

3. Purpose

AFR processes your personal data for the following purposes:

3.1 . Suppliers and service providers

- For due diligence of suppliers
- Purchase orders and contracts
- Condition of delivery and sourcing
- Payment of suppliers
- Payment of tax

- Managing our relationships with suppliers and communication with suppliers
- Security of premises

3.2. Visitors

- Logistics of visitors
- Security of premises

3.3. Website users

- Analysing the use of **AFR**'s website and services
- Ensuring the security of **AFR**'s website

3.4. Project beneficiaries and financial grantees

- To draft agreements and contract for collaboration
- Inviting to **AFR**'s events
- Collecting insights for surveys
- Publication of photos and video testimonials of **AFR**'s projects
- Financial grant processing purposes
- For research purposes
- Beneficiary feedback
- Monitoring and evaluation purposes through feedback forms
- Tracking of Micro, Small and Medium-Sized Enterprises (MSMEs) investment readiness support
- Impact Tracking
- Security of premises

We also process your personal data for the following purposes:

- Identity verification when you are exercising your rights as a data subject
- Record keeping

4. Assessing Vendors

AFR shall only use third party service providers that have a sufficient guarantee in implementing technical and organisational measures to meet the requirements of the RDPA and to ensure the protection of data subjects.

AFR's management involved in procuring outsourced service shall obtain all necessary information to ensure that the vendor is adequate, appropriate and effective for the task it has been contracted for, per the below requirements:

- **High-Risk Vendors** – A detailed due diligence must be carried out. High risk vendors shall be more strictly checked and once onboarded, shall be monitored closely and more frequently.
- **Medium-Risk Vendors** – A high level due diligence must be carried out.
- **Low-Risk Vendors** – Assessment is not mandatory.

5. Legal basis for processing your personal data

AFR processes your personal data based on one or more of the following legal bases:

- **Contractual Necessity:** Processing is necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract.
- **Legal Obligations:** Processing is necessary to comply with our legal obligations.
- **Legitimate interests:** Processing is necessary for our legitimate interests or the legitimate interests of a third party provided that such interests are not overridden by your rights and interests.
- **Consent:** Processing is based on your explicit consent which you can withdraw at any time.

AFR adheres to the data protection laws and processes sensitive personal data on the following grounds, where:

- the processing is based on your consent.
- the processing is necessary for the purposes of carrying out the obligations of the data controller, of the data processor or exercising specific rights of the data subject in accordance with relevant Laws.

6. Sharing Your Personal Data

We may share your personal data with:

- Third-party service providers, on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data.
- Legal and regulatory authorities as required by law.
- Other entities within our group.

7. Cross-Border Transfer

In certain circumstances, your personal data may be transferred to and processed outside Rwanda. We will ensure that any such transfer is compliant with applicable Data Protection Law. If your personal data is transferred to a country that does not provide an adequate level of data protection, we will implement appropriate safeguards, such as standard contractual clauses, to protect your personal data.

8. Your Data Subject Rights

You have the rights to:

- access your personal data,
- object to data processing for specific reasons,
- personal data portability,
- not to be subject to a decision based on automated data processing,
- restrict processing of personal data,
- request for erasure of your personal data when no longer required,
- update or rectify inaccurate or incomplete data, right to designate an heir to personal data and right to representation,
- withdraw your consent.

To exercise these rights please contact the Data Protection Officer as provided in section 13.

9. Data Security

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect it from unauthorised access, disclosure, alteration, and destruction.

If you become aware of or suspect any unauthorised access to your personal data or a security incident, please notify our Data Protection Officer immediately.

10. Data Retention

AFR adheres to data retention practices that are in accordance with our business requirements and applicable laws. Your personal data will be retained as long as you are using our services and for a specific period, thereafter, as mandated by relevant domestic laws. In case where the retention period is not specified in any domestic laws, AFR will retain your information to a maximum of **30 days** from the end of our engagement. Should you seek further information regarding the precise retention periods of your personal data, please do not hesitate to contact our designated Data Protection Officer as provided under section 13.

11. Your Responsibilities

You are responsible for ensuring that the data you share with us is honest, truthful, accurate, and not misleading. It should not include any material that is obscene, defamatory, infringing on third-party rights, or contains malicious code.

12. Queries and Complaints

If you have questions or concerns about your personal data processing or wish to exercise your rights, please contact our Data Protection Officer as detailed in Section 13. When reaching out, please provide a clear and detailed description of your concerns to facilitate our understanding and prompt action.

The Data Protection Officer will acknowledge receipt, investigate, and aim to respond within a specified timeframe, typically [e.g., within 30 days], with any necessary extensions communicated.

If you are dissatisfied with our response, you have the option to appeal to the supervisory authority.

13. Contact information

For inquiries or to exercise your data protection, please contact our Data Protection Officer at:

Email: dataprotection@afr.rw

Phone Number: +250 782 507 751

Address: Access to Finance Rwanda, Golden Plaza, 1 KG 546 STKacyiru, P.O BOX 1599 Kigali

Thank you for entrusting us with your personal data. Your privacy and security are paramount to us.

14. Changes to this Notice

This notice may be updated to reflect best practices, legal changes, or regulations. The latest version will be available on our **website**, and we recommend a periodic review.

Access to Finance Rwanda

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