

## **Privacy Policy**

### **1. Compliance with Applicable Laws and Regulations**

The Company shall comply with relevant laws and regulations concerning the protection of personal information and this Privacy Policy.

### **2. Purpose of Use**

The Company shall handle personal information appropriately and within the scope necessary to achieve the stated purposes, except where the customer's consent has been obtained or as permitted by law. Personal numbers shall only be handled within the scope stipulated by law.

#### **2-1 Purposes for Handling Personal Information**

The Company handles customers' personal information for the following business purposes:

##### **1. (1) Business Activities**

The Company engages in lawful foreign exchange and related services under the International Business Companies Act 2014 and the Brokerage Act 2013 of the Autonomous Island of Mwali-Moheli.

##### **2. (2) Specific Purposes of Use**

- To provide, solicit, and process applications for currency exchange services
- To provide information on exchange rates, transaction terms, and related guidance
- To verify customer identity and comply with KYC/AML requirements
- To assess the appropriateness of offering services
- To provide transaction reports, receipts, and confirmation documents
- To facilitate currency pick-up, delivery, and remittance procedures
- To perform internal administrative, accounting, and operational processes
- To conduct market research and improve services through data analysis
- To properly manage outsourced operations involving personal information
- To exercise rights and fulfill obligations under contracts or legal provisions
- To ensure smooth execution of transactions with customers

##### **3. (3) Sensitive Information**

The Company shall not acquire, use, or provide to third parties any sensitive information (e.g., political beliefs, religion, race, ethnicity, medical history, sexual orientation, criminal records), unless permitted or required by law.

#### **2-2 Sources of Personal Information and Outsourcing**

##### **4. (1) Major Sources of Information**

- Application forms and identity verification documents submitted by customers
- Information obtained through telephone, email, online inquiries, or chat
- Information provided during in-person transactions or from customer referrals
- Public sources such as newspapers, websites, and books

#### 5. (2) Major Outsourced Operations

- Development, maintenance, and operation of customer management systems
- Printing and delivery of transaction reports and receipts
- Storage and retention of customer information and documents
- Professional services such as legal and accounting advice
- Outsourced currency exchange operations and intermediary services

#### 2-3 Retention Period

The Company retains personal information for a reasonable period as required for:

- Compliance with legal obligations (e.g., retention of identity verification records)
- Maintenance of business operations
- Fulfillment of other stated purposes

#### 2-4 Provision to Third Parties

The Company will not disclose personal information to third parties without prior customer consent, except where:

- Required by law
- Necessary to protect life, body, or property and obtaining consent is difficult
- Specifically needed for public health or child development, and obtaining consent is difficult
- Cooperation with government or public agencies is required and consent may hinder operations
- Provided to academic institutions for research purposes without infringing individual rights

### 3. Security Measures

The Company ensures the accuracy and security of personal information by implementing technical and organizational measures, maintaining internal rules, limiting access to data, and providing employee training. These actions help prevent unauthorized access, loss, leakage, or alteration of personal information.

### 4. Continuous Improvement

The Company shall regularly review and update this Privacy Policy to ensure the appropriate handling of personal information.

## **5. Use of Cookies and Access Logs**

### **5-1 Cookies**

Cookies may be used to enhance the user experience and improve service quality.

### **5-2 Access Logs and Device Information**

The Company collects information such as IP addresses, browser types, and device IDs to prevent unauthorized access and enhance service delivery.

## **6. Company Information**

Company Name: Karibu Ltd.

Address: Bonovo Road – Fomboni, Island of Mohéli – Comoros Union

Representative: LOVINA CRUZ