

Sample Data Privacy Agreement¹

MacroDreams respects the privacy and security of client data. This Data Privacy Agreement (“Agreement”) describes how clients’ Personal Information and Financial Information are used, and with whom they are shared.

Sharing Client Information & Photos

Sharing Client Information

MacroDreams will not sell or share your Personal Information or Financial Information with any third parties, except in these cases :

- **When required by the National Credit Bureau.** MacroDreams uses information from the National Credit Bureau to: reduce the risk of granting loans likely to default, avoid lending to over-indebted clients, and support fraud prevention. In addition to using the National Credit Bureau to evaluate potential clients, MacroDreams provides the Bureau with the following information on all existing Clients: Client name; Client national identity number; financial products used by Client; and Client credit repayment history. All data shared with the National Credit Bureau is submitted electronically, using a secure system.
- **When you have defaulted on your loan over 180 days.** In addition to sharing default information with the National Credit Bureau, we will share the following information with the microfinance institutions in the National Microfinance Network: Client name; Client national identity number; financial products used by Client; and Client credit repayment history. Institutions in the National Microfinance Network use this information to avoid lending to clients who have not paid other loans.
- **When required by applicable laws.** This includes orders by of governmental, semi-governmental, regulatory, administrative, fiscal, judicial or quasi-judicial body, department, commission, authority, tribunal, agency or entity.
- **When you have a group loan.** An individual Client’s group members will have access to Personal Information about the Client, including loan size, loan repayment history from the National Credit Bureau and account balances. Other individual Client information will not be shared with the group, including: national identification number, savings balance (if applicable), and information about the Client’s family.

Use of Client Photos

MacroDreams requires that all clients submit to a photo when opening any type of account. This is a security measure that helps staff identify clients before making transactions in their account. Occasionally, MacroDreams uses photos and other information about clients in our marketing and other materials. MacroDreams must obtain Client’s written consent prior to using Client testimonials, photos and/or case studies in marketing or other public materials. MacroDreams will not permit the use of Client photos by any other institution without written consent from the Client.

Bundled Products

In some instances, MacroDreams offers several products for sale as one combined product, in

¹ This document is a *sample* and should be adapted to the institution and reviewed by local counsel to make sure that it conforms to applicable laws.

partnership with other financial institutions. One example is our Combined Credit and Life Insurance product. When selling products provided by another financial institution, **MacroDreams** provides the secondary institution with only the information they require, not the entire Client file. In the case of Mandatory Bundling, the Client will receive a list of the data that is shared with the other institution. In the case of Optional Bundling, **MacroDreams** must obtain Client's prior written consent prior to sharing the information with the secondary institution.

Keeping Client Information Secure

Security Measures

MacroDreams maintains physical, electronic and procedural safeguards to protect your Personal Information and Financial Information, including your photo. If our safeguard system fails and your Personal Information or Financial Information are made available to other parties, **MacroDreams** will contact you to explain the situation and provide specific instructions on how to correct the problem.

MacroDreams follows strict procedures for maintaining client data security. Our institutional data security procedures cover the following operations:

- Security of electronic data and data in hard copy;
- Security of electronic back-up systems;
- Staff access to client information;
- Copying, storage, and sharing of client data within the institution and outside the institution;
- Electronic data entry and changing data after it has been entered; and
- Archiving and disposal of client information.

Staff are informed and trained on the above data security procedures.

MacroDreams does not collect any data that could be used for illegal or arbitrary discrimination, such as information about ethnicity, religion, and political affiliations, among others.

Savings Account Privacy

Client savings information will only be shared directly with the Client. **MacroDreams** will not provide account information to the Client's family members, unless the Client agrees in writing. When opening a savings account, the Client will name an account beneficiary who will receive the Client's savings if the Client dies. We will not share information about the beneficiary with anyone except the Client.

Your Responsibilities

You help us keep your data secure. You have the following responsibilities:

- Understand the **MacroDreams** Data Privacy Agreement and know your rights;
- Keep your information updated;
- Store your financial records in a secure location and do not provide personal information (such as account and credit card information) over the phone unless you called the bank and know that you are speaking to a bank employee;
- Keep credit, debit, and savings cards secure and do not share your PIN numbers, passwords, or other ID codes other people; and
- Inform **MacroDreams** right away if you think your personal information has been misused, misappropriated, lost, or stolen.

Updating Client Information

We rely on you to tell us when your information changes—such as address, name, or marital status.

If you find your information is wrong or incomplete, please tell your credit agent, come into a branch office, or call our Customer Service Line: 555-555-5555.

Waiver of Client Rights

Clients will not be required to sign a general waiver that eliminates all rights to privacy. Client rights will not be waived unless done so voluntarily by the Client in writing. Example of a waiver of rights: sharing financial information with a potential employer or another financial service provider.

Respecting Client Preferences

If you do not want to hear from our marketing staff about other products and services, please inform them when they call, or call our Customer Service Line: 555-555-5555. If **MacroDreams** wants to share client information with affiliates for cross-selling purposes, the Client will first be given the choice to say no.

Further information

You acknowledge that we may amend this Agreement from time to time to take into consideration changes in legislation or other issues that may arise. We will post the revised Agreement on our website and make it available at our branches or we may also send it to you by mail.

If you receive a notice like one described above, and you continue to use a **MacroDreams** product or service, this means that you agree to and accept the new terms and conditions of the Agreement. If you do not agree with any of the changes made or with the new terms of the Agreement, you must immediately stop using the services and notify us that you are terminating your service with us.

Definitions

“*Client*”, “*you*” or “*your*” means an individual who has made application to us for, enrolled in or signed an application in respect of any financial product or service offered by **MacroDreams**.

“*Financial Information*” is any data collected from the client regarding the client’s money, businesses, income, expenses, repayment history, credit, guarantors, or collateral.

“*Personal information*” is any data collected from the client that is about their family, health, personal characteristics (such as attitudes and behaviors), or living conditions.

“*National Credit Bureau*” is an independent organization that compiles information from credit grantors and other sources regarding individuals' credit applications and payment behavior.

“*Group Lending*” means a single loan made to multiple clients, for which they share repayment responsibility, or loans made to individuals who share repayment responsibility with one another.

“*Mandatory Bundling*” means products offered by **MacroDreams** that *require* the client to buy more than one product at a time—in other words, the products are sold together or not at all.

“*Optional Bundling*” means products offered by **MacroDreams** that *allow but do not require* the client to buy more than one product at a time.

Please contact the **MacroDreams Customer Service Line if you have questions or complaints about our products, services, or staff: 555-555-5555. Open Mon. to Sat. 7:00- 20:00. All calls are free.**

Sample Privacy Summary Statement

MacroDreams respects the privacy and security of client data. This sheet is a **summary** of the MacroDreams full Data Privacy Agreement, which you received when you signed your loan contract. Call our Customer Service Line (555-555-5555) if you did not receive the Agreement.

SHARING CLIENT INFORMATION

MacroDreams will not sell your personal or financial information to any third parties. MacroDreams will not share your personal or financial information to any third parties, except:

- When required by the National Credit Bureau.
- When you have defaulted on your loan over 180 days. In this case, we may share your information with the National Microfinance Network and with the National Credit Bureau.
- When required by applicable laws.
- When you have a group loan, we will provide your group members with data about you, including loan size, savings balance, and loan repayment history from the National Credit Bureau.

KEEPING CLIENT INFORMATION SECURE

We maintain physical, electronic and procedural safeguards to protect your information, including your personal photo. Staff is trained to use the data security procedures. If our safeguard system fails, MacroDreams will contact you and explain the situation and how we will correct the problem. MacroDreams does not collect any data that could be used for illegal or arbitrary discrimination, such as information about ethnicity, religion, political affiliations, etc.

UPDATING CLIENT INFORMATION

We rely on you to tell us when your information changes—such as address, name, or marital status. If you find your information is incomplete or inaccurate, please notify your credit agent, come into a branch office, or call our Customer Service Line: 555-555-5555.

RESPECTING CLIENT PREFERENCES

If you do not wish to hear from our marketing staff about other products and services, please inform them when they call, or call our Customer Service Line: 555-555-555.

YOUR RESPONSIBILITIES

- Understand the MacroDreams Data Privacy Agreement and know your rights;
- Keep your information updated;
- Store your financial records securely and do not provide personal information (such as account information) over the phone unless you called MacroDreams;
- Keep credit, debit, and savings cards secure and do not share your PIN numbers, passwords, or other ID codes with other people; and
- Inform MacroDreams right away if you think your personal information has been misused, misappropriated, lost or stolen.

AMENDMENT

The Data Privacy Agreement may be amended from time to time (see section titled “Further Information” of Data Privacy Agreement, for an explanation of how we will advise you of any future changes).

Please contact the MacroDreams Customer Service Line if you have questions or complaints about our products, services, or staff: 555-555-5555. Open Monday to Saturday 7:00- 20:00. All calls are free.

