



VISACREDIT

Privacy Policy

visacredit.info Platform

Published by the Visacredit group — operated locally by the applicable entity in each country

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1. Introduction

This Privacy Policy describes how the entity of the Visacredit group legally established in the User's country of residence or registration (hereinafter the "Operating Entity", "Visacredit", "we"), publisher and operator of the "Visacredit" platform ("the Platform") for that country, collects, uses, shares and protects the personal data of its Users ("you").

The Operating Entity applicable to the User is determined according to the following table:

Pays / zone	Entité applicable	Immatriculation
Benin	Visacredit Tech Bénin SARL	RCCM Cotonou RB/COT/25 B 40300
Côte d'Ivoire	Visacredit Tech Côte d'Ivoire	Registration in progress
Any other country in the UEMOA/CEMAC zone or outside the zone, without an established local entity	Visacredit Tech Bénin SARL (by default)	RCCM Cotonou RB/COT/25 B 40300

Where no entity of the Visacredit group is established in the User's country of residence or registration, Visacredit Tech Bénin SARL acts as the default Operating Entity. This list is updated as new local entities of the group are created, without this requiring any amendment to this document other than an update to the table above.

Unless otherwise stated, any reference to "Visacredit", "Visacredit group", "we", "our", "us" in this document and in the associated documents (Terms of Use, Terms of Sale, Special Coaching Terms, Privacy Policy, Cookie Policy) refers to the Operating Entity applicable to the User concerned, in its capacity as publisher and operator of the Platform for its country.

These Operating Entities are subsidiaries of the Visacredit group, whose holding company is Visacredit Tech Inc., a company incorporated under the laws of the United States in the State of Delaware (United States of America) — EIN (IRS): 32-0842131, File Number: 10277308. Visacredit Tech Inc. does not perform any operational role in the operation of the Platform, regardless of the User's country: it does not take part in providing the services, does not manage the relationship with the User or the Financial Partner, and does not process their data for operational purposes. Its role is limited to that of a holding company, owner of the trademarks, of the "Visacredit" name and of the group's intellectual property, licensed to the Operating Entities. These operational activities fall exclusively within the remit of the applicable Operating Entity.

This policy applies in compliance with the law applicable in the country of the Operating Entity — in particular Beninese Law No. 2017-20 on the Digital Code for Users falling under Visacredit Tech Bénin SARL — and, for Users located in the European Union, the General Data Protection Regulation (GDPR).

By accepting this Policy, you give your explicit consent to the collection and processing of your personal data, both in the country of the Operating Entity and abroad (in particular in France and the United States), as well as to its sharing and storage in those countries, which offer similar guarantees regarding the protection of personal data.

2. Data controller

The Operating Entity applicable to the User, as identified in the table in Article 1, is solely responsible for the processing of their data, in its capacity as publisher and operator of the Platform for its country.

Visacredit Tech Inc., the group's holding company (Delaware, United States), has no operational role in the operation of the Platform and does not process Users' data for operational purposes, regardless of their country.

For any question relating to this policy or the exercise of your rights, you may contact Visacredit at: contact@visacredit.info or compliance@visacredit.info.

3. Data we collect

3.1 Directly collected data

- Identification data (last name, first name, place and date of birth, photo, identity card, passport or residence permit numbers, gender, age, etc.)
- Contact data (email address, phone number, etc.)
- Data related to digital activity (IP address, browsing activity, geolocation, etc.)
- Login data used to access the Visacredit account
- Data from interactions with Customer Service, the sales team, the website, the mobile app and social networks
- Economic, financial and tax data (country of residence, etc.)
- Transactional and banking data (payment card number, beneficiary or payer data, payment incidents, mobile money number, etc.)
- Employment data (occupation, income-generating activities)
- Data necessary for financial inclusion and the prevention of over-indebtedness

Visacredit never processes data relating to racial or ethnic origin, political opinions, religion, philosophical beliefs, trade union membership, or genetic data.

3.2 Indirectly collected data

Visacredit may collect personal data from partners and third-party organizations in order to verify or enrich its databases: publications and databases made accessible by official authorities, partners, service providers, payment initiators, commercial information organizations, organizations combating fraud, money laundering and terrorist financing, websites or social media pages containing publicly available information.

Subject to authorization from the competent regulators, Visacredit may collect data considered sensitive under applicable law (health data, filiation data, National Social Security (CNSS) number, data relating to criminal offenses or convictions).

4. Purposes of processing

- Providing services to Users and operational management
- Managing the relationship with the User
- Analyzing the file, calculating the Score and preparing the Financial Profile Report
- Referring and connecting Users with Financial Partners
- Complying with legal and regulatory obligations (KYC/AML, international sanctions, tax obligations)
- Managing data transfers and financial/accounting management
- Communication and commercial prospecting, subject to the required consent

5. Legal basis for processing

- Performance of the contract binding us to you (Terms of Use), for the provision of the service
- Compliance with a legal obligation, in particular regarding the fight against money laundering and terrorist financing (AML/CFT), KYC compliance and tax obligations



- Our legitimate interest, for the security of the Platform, fraud prevention and the improvement of our services
- Your consent, in particular for sharing your file with Financial Partners, for commercial prospecting, and for certain non-essential cookies (see our Cookie Policy)

6. Data sharing

Visacredit shares or may share your personal data, subject to what applicable regulations permit, with:

- The internal departments and services of the Operating Entity, as well as the Visacredit group and its companies
- The selected Financial Partners, to the extent necessary for processing your Financing Request and with your explicit consent
- Service providers who collaborate with Visacredit (identity and compliance verification, technical infrastructure and hosting, customer relationship management, studies)
- Financial, judicial and regulatory authorities and government agencies, to the extent permitted by applicable regulations
- Technology partners with whom Visacredit has a contractual relationship

Visacredit Tech Inc., the group's holding company, may receive aggregated or anonymized data for group governance and consolidation purposes, but does not have access, in its capacity as a holding company, to your identifiable personal data for operational use.

Visacredit does not sell or rent your personal data to third parties for commercial or advertising purposes.

7. Confidentiality of coaching exchanges

Information shared during Coaching Sessions is treated with enhanced confidentiality and is accessible only to the intervening coach and, where absolutely necessary, to Visacredit's quality officer. It is never shared with Financial Partners without the User's explicit consent. This confidentiality is distinct from the Score and the Financial Profile Report, the sharing of which with Financial Partners is governed by this Policy and the consent given upon registration. For further details, please refer to the Special Coaching Terms (SCT).

8. International data transfers

Your data is primarily processed and stored in the country of the applicable Operating Entity. Some of Visacredit's partners are located abroad or have data centers outside the country of the Operating Entity; in performing their obligations, these partners may process and store your data in countries offering equivalent protection guarantees.

Visacredit also shares your data with its partners located abroad, in particular in France and the United States, it being understood that these countries offer personal-data protection guarantees and that Visacredit has completed the regulatory formalities applicable to such transfers.

9. Retention period

Your data, including your documents or their reproductions, is recorded and retained for a period of ten (10) years by the Operating Entity, in accordance with applicable laws, its accounting requirements, and customer relationship management, as well as to assert legal rights or respond to requests from regulatory bodies.

Credit information is only disseminated within a maximum age of five (5) years, and is retained for an additional five (5) years after the deletion of the User's account on the Platform.

10. Data security

As Data Controller, the Operating Entity implements all useful technical and organizational measures to preserve the security of your data, prevent it from being altered, damaged or disclosed to unauthorized third parties, and to appoint a data protection officer.

11. Your rights

- Right of access and information regarding the processing of your personal data
- Right of rectification and update of inaccurate, incomplete, ambiguous or outdated data
- Right to erasure, within the limits of our legal retention obligations
- Right to object, in particular for commercial prospecting purposes and related profiling
- Right to data portability
- Right to withdraw your consent at any time, where processing is based on it

You may update your data every quarter, or urgently by providing supporting documents for the changes to be recorded on the Platform. To exercise these rights, contact us at contact@visacredit.info or compliance@visacredit.info, including a scan or copy of your proof of identity.

You also have the right to lodge a complaint with the data protection authority of the country of the applicable Operating Entity (for example, the APDP of Benin for Users falling under Visacredit Tech Bénin SARL) or, where applicable, the competent supervisory authority of your country of residence.

12. Cookies and trackers

The use of cookies and similar technologies on Visacredit's website is covered by a separate Cookie Policy, available independently.

13. Minors

The Platform is reserved for adult individuals and duly incorporated businesses. It is not intended for minors.

14. Amendment of this policy

Visacredit reserves the right to amend this Privacy Policy at any time, in particular to comply with any legal, regulatory, technical or functional developments of the Platform, or to update the list of the group's Operating Entities. You will be informed of updates through our usual communication channels; the version in effect is the one published on the website and in the app, with the date of its last update indicated. Use of the services after such notice constitutes acceptance of the amendments.

15. Contact

For any question relating to this Privacy Policy or the protection of your personal data, you may contact us at: contact@visacredit.info or compliance@visacredit.info.