



PRIVACY POLICY CASH AGENTS

Last updated 12 June 2018

This Privacy Policy explains what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

SecureAid is a money transfer coordination and tracking software-as-a-service solution and gives confidence to the senders of aid that the right people are receiving their financial support. This Privacy Policy applies to money transfer agents (or "Cash Agents") who have an account with SecureAid and use the SecureAid App.

An account with SecureAid interfaces with an Amanacard and the SecureAid App. When you open a SecureAid account and use an Amanacard or the SecureAid App as a Cash Agent, we will need to collect and process your personal data in accordance with the Terms & Conditions (English; Arabic).

SecureAid is provided to you by Beechwood and is operated on its behalf by Huozhi Ltd. For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data is Beechwood International Ltd of 47 Marylebone Lane, London, W1U 2NT, United Kingdom ("Beechwood", "us" or "we").

WHAT

- **What is the nature of the data that Beechwood will be collecting about you via SecureAid?**

We will collect the following information from you:

- Gender
 - Full name
 - Date of birth
 - Copy of an ID
 - Mobile number
 - Business name and address
- We will also collect information about the cash pay-outs or non-cash purchases you facilitate using the SecureAid App, and convert this to anonymised statistical data for reporting purposes and settlement of the debt owing to you.

- **What information does Beechwood receive about you from third parties?**

We will receive information about you that you have already provided when being contracted by an organisation to deliver services in the aid programme that will now make use of SecureAid. This includes: your gender, your full name, your date of birth, you ID, your mobile number and your business name and address.

- **How long will Beechwood hold this data for?**

We hold data for the minimum duration necessary to fulfil the stated requirements of your contract. We delete all personal data at the close of your use of SecureAid, and will only retain a copy of the data for the following reasons:

- compliance with Applicable Laws or Applicable Policies
- continuing right to store or use such data pursuant to another agreement with you or third parties – for example, you may wish to retain a record of your financial activity and thus build a transaction history

HOW

- **How will Beechwood collect the data?**

We will receive information directly from you (in person or remotely), and in the case where you are already contracted by a partner organisation, we may receive information securely from them.

- **How will Beechwood use the data itself and if it discloses it to third parties, what is the basis on which it would do so?**

We will collect and store your information so that we can provide you with a SecureAid account, and any necessary related services. We believe that it is within our legitimate interests to do so.

We share personal data with partner organisations where this is necessary in relation to the purpose for which the data was obtained, and covered by a data sharing agreement.

Prior to sharing data with partner organisations, we will anonymise any personal data in accordance with the United Kingdom's Information Commissioner Office (ICO)'s anonymisation code of practice, withholding any detailed information that could allow individuals to be identified: <https://ico.org.uk/>.

WHERE

- **Where will Beechwood hold this data and, consequently, where will it be accessible from?**

Beechwood will hold this data on servers hosted in the European Union. It will only be accessible by authorised personnel in the United Kingdom, and a minimum level of information (full name and date of birth) is accessible temporarily when we meet you in person to issue your PIN or HIN.

RIGHTS

- **How can you exercise your rights under the legislation?**

You have the right to know what information we hold about you and process on your behalf, and you also have the right to ask for it to be rectified, or for it to be erased (except in cases listed in paragraph 3 of Art. 17 GDPR). If you have a SecureAid account and would like to contact us about your information, please contact us at: contact@huozhi.org. We will respond within 30 calendar days of receiving your enquiry.

You also have the right to lodge a complaint with your local supervisory authority. The supervisory authority in the United Kingdom is the Information Commissioner's Office at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: +44 303 123 1113; Email: casework@ico.org.uk).

By providing us with your mobile number, we can make you aware of any changes to this policy and contact information.