

FIINAFAS PROTECTION OF PERSONAL DATA

1. Introduction

Fiinafas is committed to protecting the protection, privacy and security of your personal data. This policy outlines how we collect, use, and protect your information when you use our hybrid coaching solution on financial well-being. It also explains your rights regarding your personal data. Noting that we adhere to the **General Data Protection Regulation (GDPR)** and upholding the highest ethical standards.

2. Key commitments

We collect personal information that you provide directly when registering or using the Fiinafas application, including:

- Full name
- Contact information (email, phone number)
- Financial information (for coaching purposes)
- Demographic data (age, gender, location)
- Any other information you choose to provide through surveys, diagnostics, or feedback.

3. How we use your data

Fiinafas uses your personal data for the following purposes:

- To provide and improve the coaching services.
- To personalise user experiences and recommendations.
- To generate anonymised statistics for research and service improvement.
- To communicate with you regarding updates, new features, or support.
- To contact you through channels you have agreed to use (including WhatsApp messages during the diagnostic and coaching phases).

4. Use of WhatsApp Communication

Fiinafas may use WhatsApp as a communication channel for certain users and only under the following conditions:

5. **Purpose:** WhatsApp messages are used to support users during the **diagnostic phase** or for personalised follow-up, **strictly for non-commercial and educational purposes**.
6. **Transparency:** Every WhatsApp message sent by Fiinafas or its coaches includes the note *"Reply STOP to opt out"*.
7. **Opt-out:** Users can withdraw their consent to receive WhatsApp messages at any time by:
 - a. Replying **"STOP"** on WhatsApp, or
 - b. Sending an email to coach@fiinafas.com with the subject line **"OPT OUT"** with their phone numbers and personal information.
8. Once an opt-out is received, Fiinafas will immediately stop all WhatsApp communications, except for legally required notifications or pending service matters.

9. Data anonymisation

Any personal data shared with partner organisations will be anonymised to ensure that individuals cannot be identified. This means that your identity and personal information will be protected, and only non-personally identifiable data will be accessible to our partners.

10. Who has access to your data

- **Fiinafas:** Only authorised Fiinafas personnel will have access to your identifiable personal data, strictly for service provision and support.
- **Partner Organisations:** Certain anonymised data may be shared with our partner organisations to improve the service and for research purposes. These partners will not have access to any personally identifiable information unless you provide explicit consent.
- **Third-party services:** Certain technical providers (e.g., hosting, analytics, or WhatsApp Business API) may process limited data under data processing agreements that ensure GDPR compliance.

11. How we protect your data

We implement a range of security measures to protect your personal data, including:

- Encryption of data during transmission and storage
- Restricted access to personal data, only to authorised personnel and partner organisations

- Regular audits and security updates to safeguard data from breaches.
- Use of GDPR-compliant third-party services and processors.

12. Your rights

You have the right to:

- Access the personal data we hold about you.
- Rectify any inaccurate or incomplete data.
- Request erasure (“right to be forgotten”) where legally applicable.
- Withdraw consent for specific processing (including WhatsApp communications).
- Lodge a complaint with a supervisory authority if you believe your data rights have been violated.

You can exercise these rights by contacting us at contact@fiinafas.com.

13. Consent

By using the Fiinafas coaching application, you agree to the collection and use of your personal data as outlined in this policy. You will be provided with an option to give explicit consent to share anonymised data with partner organisations when you sign up for the service.

14. Policy updates

Fiinafas may update this policy from time to time to reflect regulatory or operational changes. Users will be informed of any significant changes, and the updated policy will be available within the application and on our website.

15. Contact us

If you have any questions or concerns about this policy or your personal data, please contact us at:

-  contact@fiinafas.com
-  coach@fiinafas.com (for OPT OUT or WhatsApp-related matters)