LEGAL

Privacy Policy

Hargeisa · Bosaso · Mogadishu · Version 1.0 · July 2026 · gumfi.com

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Gobanimo Microfinance ("Gobanimo Microfinance", "we", "us") provides Sharia-compliant, technology-enabled microfinance in Hargeisa, Bosaso, and Mogadishu. This policy explains what personal information we collect, why we collect it, how we protect it, and the choices you have. It applies to our website, mobile app, WhatsApp and agent channels, and our offices.

Our core commitment: raw personal data is kept out of AI prompts, logs, traces, and analytics. Access is role-based and audited, and every financing decision is made by a human officer.

1. Information we collect

- **Identity and contact details** — name, national ID or passport, date of birth, phone number, email, and address, collected when you apply or invest.
- **Business and financial information** — business type, income, expenses, references, and mobile-money statements needed to assess a facility.
- **Transaction records** — disbursements, repayments, wallet top-ups, and investor distributions.
- **Verification data** — documents and photographs submitted for KYC, and the results of sanctions and PEP screening.
- **Device and usage data** — device type, app version, language preference, and pages visited, used to keep the service secure and improve it.

We collect information directly from you, from your transactions with us, and — with your consent — from referees, vendors, and mobile-money providers.

2. How we use your information

- To assess, approve, disburse, and service Sharia-compliant financing (Mudaraba, Murabaha, Ijara).
- To place and administer Mudaraba investments and pay profit distributions.
- To meet Know-Your-Customer (KYC), anti-money-laundering and counter-terrorist-financing (AML/CFT), and sanctions-screening obligations.
- To communicate with you about your account, repayments, and distributions.
- To handle complaints and support requests.
- To detect and prevent fraud and misuse.
- To produce anonymised statistics and impact reporting.

We do **not** sell your personal data, use it for riba-based or speculative purposes, or use it for advertising by third parties.

3. Legal and ethical basis

We process personal data where it is necessary to provide services you have requested, to meet legal and regulatory duties in our operating jurisdictions, to pursue legitimate interests such as fraud prevention, or with your consent where required. Where processing relies on consent, you may withdraw it at any time.

4. Automated systems and human decisions

We use technology, including AI-assisted tools, to prepare and organise applications. These systems operate behind a PII firewall: raw personal data is not placed into AI prompts, model logs, or analytics. **Every final financing decision is made by a trained Gobanimo Microfinance officer, not by a machine.** You may ask for an explanation of any decision that affects you.

5. Sharing your information

We share personal data only as needed with:

- **Regulated partners** — mobile-money and payment providers used to disburse and collect funds.
- **Regulators, supervisors, and auditors** — where required by law or a supervised-pilot arrangement.
- **Service providers** — hosting and technology vendors bound by confidentiality and data-protection obligations.
- **Professional advisers** — lawyers, auditors, and the Sharia Board, under confidentiality.

We require all recipients to protect your data. We do not transfer your data to any party for marketing purposes.

6. How we protect your data

- Role-based access control and segregation of duties.
- An append-only audit trail of who accessed and changed what.
- Encryption of data in transit and at rest.
- A PII firewall keeping raw personal data out of AI systems and analytics.
- Staff confidentiality obligations and security training.
- Incident-response procedures; we will notify you and the relevant authority of any breach that puts you at risk, as required by law.

7. Retention

We keep records only as long as needed to provide services and to meet legal, regulatory, audit, and Sharia-governance requirements — five years after account closure, or longer where applicable AML law requires. When data is no longer required, it is deleted or irreversibly anonymised.

8. Your rights

Subject to applicable law, you may:

- request a copy of the personal data we hold about you;
- ask us to correct inaccurate or incomplete data;
- withdraw consent where processing relies on it;
- request deletion of data we are not legally required to keep;
- object to or ask us to restrict certain processing;
- complain to us — and to the relevant supervisory authority — if you believe your data has been mishandled.

To exercise any of these rights, contact us using the details below. We respond within 30 days.

9. Children

Our services are for adults able to enter contracts. We do not knowingly collect data from children.

10. Changes to this policy

We may update this policy as our services and legal obligations evolve. Material changes will be announced on this page and, where appropriate, by direct notice. The "Last updated" date shows the current version.

11. Contact

Data Protection Contact — Gobanimo Microfinance
Hargeisa, Somaliland
Email: gumfi.info@gmail.com
Or via the Contact page on this website.