

Credifi Privacy & Data Security Policy

Effective Date: October 29, 2025

Credifi (Credi Finance, Inc.) underwrites and services unsecured consumer credit. This notice explains what personal data we collect, why we keep it, and the safeguards in place.

1. Overview

Credifi underwrites and services unsecured consumer credit on-chain. To meet regulatory requirements and provide ongoing loan servicing, we retain certain user data **in encrypted form** within our backend.

2. Data We Collect & Why We Retain It

Category	Examples	Purpose
Identification & KYC	Legal name, date of birth, address, government ID details.	Verify identity, comply with KYC/AML laws.
Financial Data	Bank account metadata, soft credit report.	Credit assessment, loan origination, ongoing risk monitoring.
On-chain Loan Events	Immutable transaction hashes, timestamps, repayment events (stored directly on public blockchain).	Trustless auditability.

We store this data encrypted to:

1. Fulfil legal retention obligations.
2. Enable credit underwriting and monitoring.
3. Provide transparent and auditable records for users, lenders, and regulators.

3. Data Retention Schedule

Data Type	Retention Period	Deletion Method
Identification & KYC	Minimum 7 years after account closure	Secure wipe
Financial Data (off-chain)	Duration of loan + 7 years	Secure wipe
On-chain Loan Events	N/A (recorded permanently on blockchain)	Not technically erasable.

Blockchain entries are immutable and beyond Credifi's control. We cannot alter or delete them.

4. Your Rights & Controls

Access / Portability – Download a machine-readable copy of your data.

Correction – Fix inaccuracies.

Deletion – Request erasure once statutory retention periods lapse (except blockchain data).

Objection / Restriction– Where applicable, object to certain processing.

Contact us at privacy@credi.fi to exercise these rights. We will respond within 30 days.

5. Data Sharing and Marketing Practices

Credifi does not share, sell, or lease user information with any third parties or affiliates for marketing or promotional purposes. Any data shared with subcontractors or outsourced service providers is solely to fulfill the service the end-user.

6. Legal & Regulatory Disclosures

We may disclose your data to:

1. **Law-enforcement agencies, regulators, or courts** when legally required (e.g., subpoena, court order).
2. **Debt-collection service-providers and consumer-reporting agencies** if you default on your obligations.

We will notify you of a disclosure unless legally prohibited.

7. Use of Monitoring and Session Replay

We use Real User Monitoring (RUM) and Session Replay to help us understand how our website/app is used and to improve its performance and reliability. These tools automatically collect information such as pages visited, buttons clicked, browser type, device type, approximate location, and technical errors. When Session Replay is enabled, it records your interactions with our site so we can understand issues and improve usability.

No sensitive personal information is captured. Data collected is used only for performance monitoring, troubleshooting, and product improvement.

8. Changes to This Policy

We may revise this notice from time to time. Material changes will be posted on <https://credi.fi> at least 30 days before they take effect.

9. Contact Us

Email privacy@credi.fi