AL MAKKAH TELECOM (PRIVATE) LIMITED

APNAPAY DIGITAL WALLET — OFFICIAL PRIVACY & SECURITY POLICY

Compliance Standard: State Bank of Pakistan (SBP) & SECP Guidelines | Effective Date: October 2026

This Privacy Policy outlines how **AL MAKKAH TELECOM (PRIVATE) LIMITED** ("Company", "AMT", "We", "Us") collects, protects, processes, and handles user personal and financial data on the **ApnaPay** mobile application and digital wallet platform.

1. REGULATORY FRAMEWORK & BANKING PARTNERSHIP DISCLOSURE

1.1. SECP Incorporation: AL MAKKAH TELECOM (PVT) LTD is a legally incorporated corporate body under the laws of Pakistan, registered with the Securities and Exchange Commission of Pakistan (SECP).

1.2. Regulatory Status Disclosure: *AL MAKKAH TELECOM (PVT) LTD does not independently hold an Electronic Money Institution (EMI) or Banking License directly issued by the State Bank of Pakistan (SBP).*

1.3. Banking API Infrastructure: All financial ledger management, funds storage, payment processing, transaction authentication, and settlement infrastructure integrated into ApnaPay operate via APIs connected directly to commercial banks and financial institutions licensed and supervised by the State Bank of Pakistan (SBP).

2. INFORMATION WE COLLECT

To provide secure digital wallet services and comply with mandatory e-KYC/AML regulations, we collect the following information:

- **Identity Data:** Full name, CNIC/SNIC number, date of birth, mother's maiden name, and live biometric/facial verification data.
- **Contact Information:** Registered mobile phone number, email address, residential/business physical address.
- **Financial & Transactional Data:** Wallet balance, transaction histories, linked bank account numbers (IBAN), utility payment details, and transfer logs.
- **Technical & Device Data:** Device ID, IMEI, IP address, operating system version, and location data required for fraud prevention.

3. STRICT SECURITY MANDATE: PIN, OTP & ACCOUNT CREDENTIAL CONFIDENTIALITY

> **CRITICAL SECURITY WARNING — USER RESPONSIBILITY & ZERO LIABILITY DISCLAIMER:**
>
> Your Account Personal Identification Number (PIN), One-Time Passwords (OTP), Login Passwords, and Biometric locks are **strictly confidential** personal security credentials. You must never share your PIN, OTP, or password with ANYONE under any circumstance.

3.1. Company & Bank Staff Policy: Neither ApnaPay, nor AL MAKKAH TELECOM (PVT) LTD staff, nor our SBP-licensed partner bank employees will EVER call, message, email, or ask you to reveal your Account PIN, OTP, or Password.

3.2. Impersonation Fraud Warning: Any call, SMS, or message claiming to be from ApnaPay, Bank Support, Police, SBP, or Law Enforcement asking for your OTP or PIN is fraudulent. Do not share your credentials.

3.3. Full User Liability: If you voluntarily or carelessly share your PIN, OTP, or password with any third party, family member, stranger, or fraudulent caller, **YOU WILL BE SOLELY AND EXCLUSIVELY LIABLE FOR ALL RESULTING FINANCIAL LOSSES**. ApnaPay, AL MAKKAH TELECOM (PVT) LTD, and our Partner Bank hold ZERO financial or legal liability for losses caused by credential sharing.

4. USE OF COLLECTED DATA & REGULATORY REPORTING

We process collected data in accordance with SBP data protection standards for the following lawful purposes:

- Verification of customer identity under regulatory Know Your Customer (KYC) requirements.
- Execution and settlement of payment transactions via our SBP-licensed banking partner APIs.
- Prevention, detection, and mitigation of financial fraud, money laundering, cybercrime, and unauthorized account access.
- Fulfilling legal disclosure mandates issued by the State Bank of Pakistan (SBP), SECP, Financial Monitoring Unit (FMU), or Courts of Law.

5. DATA SHARING & THIRD-PARTY DISCLOSURES

5.1. Banking Partners: Personal and transaction data is securely transmitted to our licensed SBP banking partners solely for processing payments, clearing transfers, and maintaining legal ledgers.

5.2. Law Enforcement & Government Bodies: As required by the Laws of the Government of Pakistan, we share relevant user data with law enforcement agencies (e.g., FIA, Police) in cases involving suspicious activities, financial fraud, cybercrime, or FIR investigations.

5.3. No Commercial Sale: We do not sell, rent, or trade your personal data to third-party marketing companies.

6. DATA STORAGE, ENCRYPTION & PROTECTION

6.1. Technical Safeguards: ApnaPay employs standard bank-grade SSL/TLS encryption protocols, firewalls, and secure tokenization to protect data transmission between your mobile device and backend bank servers.

6.2. Retention Period: Transaction logs and KYC records are securely retained for the minimum statutory period mandated by SBP guidelines and Anti-Money Laundering (AML) regulations in Pakistan.

7. USER RIGHTS & COMPLIANCE INQUIRIES

Users have the right to request updates to their personal contact data upon providing supporting documentation. For account security inquiries, suspicious call reporting, or privacy complaints, users may contact our dedicated Compliance Office.

8. CORPORATE HEAD OFFICE & PRIVACY CONTACT

Legal Entity:	AL MAKKAH TELECOM (PRIVATE) LIMITED
Product / App:	ApnaPay Digital Wallet
Corporate Address:	Old UBL Bank Building, Near Head Sulaimanki Road, Minchinabad, District Bahawalnagar, Punjab, Pakistan.
Helpline Contact:	+92 300 0075630
Privacy & Compliance Email:	info@apnapay.com.pk