



Data Protection Policy

Background:

This data protection policy explains the personal data Centonomy Limited (the **Company**) collects, how the data is processed and the purpose(s) of the data collected in line with the data protection legislation in Kenya.

This policy applies to all customers and suppliers and all visitors frequenting any of the Company's premises or using the Company's websites.

Definitions:

In this policy, unless otherwise stated the following words shall have the following meanings:

We means the Company; and

You means the data subject.

Collection of Information:

We may collect or process your personal data or information with your knowledge and express consent when you do any of the following (please note that this list is not exhaustive):

access the Company's website;

register for a specific product or service, including but not limited to Centonomy 101, Centonomy Entrepreneur, Centonomy Career Hub, Centonomy Campus Edition;

ask the Company for more information about a product or service or contact the Company with a query or complaint;

respond to or participate in a survey, marketing promotion, prize competition or special offer;

pay for any of the Company's products and services; and

we also collect information when you visit any of our premises.

What information we collect:

We may collect and store personal data and information about you including but not limited to the following;

your identity and bio data, including your name, photograph, address, location, identity document type and number, date of birth, age, gender and contact details;

your credit or debit card information, which information is collected upon payment for our services and/or products;

your contact information, such as when you call us or interact with us through social media, email threads and 'snail mail'.

Purpose of collection and use of personal data:

We may use and analyze your information for the following purposes:

provision of services and products for which you have paid for;

billing you for the products and services provided to you by the Company;

responding to any of your queries or concerns;

verifying your identity information through publicly available and/or restricted government databases in order to comply with applicable regulatory requirement;

keeping you informed about new products and services contacting you with offers or promotions based on how and what products and/or services that you have previously purchased from us;

to comply with any legal, governmental or regulatory requirement for use by our lawyers in connection with any legal proceedings;

in business practices including to quality control, training and ensuring effective systems operations; and

for research, statistical, survey and other scientific or business purposes.

Sensitive data:

We may collect sensitive data about you including details about your gender in line with the data protection legislation.

Processing your personal data:

We shall always ensure that in processing your personal data:

- we act in accordance with your right to privacy;
- we process such personal data lawfully, fairly and in a transparent manner;
- such data is collected for explicit, specified and legitimate purposes and not further processed in a manner incompatible with those purposes;
- such data is adequate, relevant, limited to what is necessary in relation to the purposes for which it is processed;
- the data is collected only where a valid explanation is provided whenever information relating to private affairs is required;
- such data is accurate and, where necessary, kept up to date, with every reasonable step being taken to ensure that any inaccurate personal data is erased or rectified without delay;
- such data is kept in a form which identifies the data subjects for no longer than is necessary for the purposes which it was collected; and
- the personal data is not transferred outside Kenya, unless there is proof of adequate data protection safeguards or consent from you.

Retention of information

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Your rights

Subject to legal and contractual exceptions, you have rights under data protection laws with respect to favor personal data. These are listed below: -

the right to be informed of the use to which your Personal Data is to be put;

the right to access your Personal Data;

the right to object to the processing of all or part of your Personal Data;

the right to the correction of any false or misleading parts of your Personal Data;
and

the right to the deletion any false or misleading parts of your Personal Data.

the right to receive your personal Data in a structured, commonly-used and machine-readable format and to transmit it from us to another data controller or data processor without hindrance (the right to data portability);

the right not to be subjected to a decision based solely on automated processing which produces legal effects that concern or significantly affect you; and

the right to the rectification of any inaccurate, outdated, incomplete or misleading portions or parts of your Personal Data and to the erasure or destruction of any portions or parts of your Personal Data that are irrelevant, excessive, unlawfully obtained or that we are no longer authorised to retain.

Contact details:

If you would like to contact us regarding this policy, below are our contact details:

Email: talkcents@centonomy.com

Office No: +254 20 4443695

Mobile: +254 795359535

Mobile: +254 724011912

Victoria Plaza, Parklands Road, Westlands
Box 780- 00606 Nairobi, Kenya
Tel: +254 20 4443695/ 0700 036433

Amendments to this policy:

The Company reserves the right to amend or modify this statement at any time. If the Company amends this statement, you can access the most current version of the data protection policy on our website. Any amendment or modification of this statement will take effect from the date of notification on the Company's website.