

# PRIVACY POLICY

## ENFINITE SOLUTIONS LIMITED

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VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR

<b>PREPARED BY</b>	Judy Wambui	<b>TITLE</b>	VP OF PRODUCTS	<b>DATE</b>	15/01/2022
<b>APPROVED BY</b>	George N. Njoroge	<b>TITLE</b>	CEO	<b>DATE</b>	01/02/2022

## **1. Introduction**

1.1 We are committed to safeguarding the privacy of our website visitors, service users, and corporate customers.

1.2 This policy applies where we are acting as a data controller with respect to the data of such persons/organization; in other words, where we determine the purposes and means of the processing of that data.

1.3 In this policy, "we", "us" and "our" refer to Enfinite Solutions Limited. For more information about us, see Section 9.

1.4 In this policy, "data" refers to personal and/or corporate data.

## **2. The data that we collect**

2.1 In this Section 2 we have set out the general categories of data that we process and, in the case of data that we did not obtain directly from you, information about the source and specific categories of that data.

2.2 We may process data enabling us to get in touch with you ("contact data"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers.

2.3 We may process information contained in or relating to any communication that you send to us or that we send to you ("communication data"). The communication data may include the communication content and metadata associated with the communication.

2.4 We may process data about your use of our applications and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

### **3. Purposes of processing and legal bases**

In this Section 3, we have set out the purposes for which we may process the data and the legal bases of the processing.

**3.1 Operations** - We may process your data for the purposes of operating our applications, the processing and fulfilment of orders, supplying our services, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our applications, services and business.

**3.2 Relationships and communications** - We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our applications, services and business.

**3.3 Direct marketing** - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.

**3.4 Research and analysis** - We may process usage data and/or transaction data for the purposes of researching and analyzing the use of our applications and services, as well as researching and analyzing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our applications, services and business generally.

**3.5 Record keeping** - We may process your data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

**3.6 Security** - We may process your data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our applications, services and business, and the protection of others.

**3.7 Insurance and risk management** - We may process your data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

**3.8 Legal claims** - We may process your data where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

**3.9 Legal compliance and vital interests** - We may also process your data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

#### **4. Providing your data to others**

4.1 We may disclose your data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

4.2 Your data held in our database will be stored on the servers of our hosting services providers.

4.3 In addition to the specific disclosures of data set out in this Section 4, we may disclose your data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests. We may also disclose your data where such disclosure is necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **5. Hosting of your data**

5.1 The hosting facilities for our website are situated in the United States of America (USA). The competent data protection authorities have made an adequacy determination with respect to the data protection laws of this country.

## 6. Retaining and deleting data

6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of data.

6.2 Data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your data as follows:

- contact data will be retained for a minimum period of 1 days following the date of the date of enrollment to use our applications, and for a maximum period of 30 days following the data of your account closure and/or termination;
- account data will be retained for a minimum period of 1 days following the date of the date of enrollment to use our applications, and for a maximum period of 30 days following the data of your account closure and/or termination;
- transaction data will be retained for a minimum period of 1 days following the date of the date of enrollment to use our applications, and for a maximum period of 30 days following the data of your account closure and/or termination;
- communication data will be retained for a minimum period of 1 days following the date of the date of enrollment to use our applications, and for a maximum period of 30 days following the data of your account closure and/or termination and
- usage data will be retained for 1 days following the date of the date of enrollment to use our applications, and for a maximum period of 30 days following the data of your account closure and/or termination;

6.4 Notwithstanding the other provisions of this Section 6, we may retain your data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests.

## 7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

- the right to access - you can ask for backup copies of your data;
- the right to rectification - you can ask us to rectify inaccurate data and to complete incomplete data;
- the right to erasure - you can ask us to erase your data;
- the right to restrict processing - you can ask us to restrict the processing of your data;
- the right to object to processing - you can object to the processing of your data;
- the right to data portability - you can ask that we transfer your data to another organization or to you;
- the right to complain to a supervisory authority - you can complain about our processing of your data; and
- the right to withdraw consent - to the extent that the legal basis of our processing of your data is consent, you can withdraw that consent.

7.3 You may exercise any of your rights in relation to your data by written notice to us, using the contact details set out below

Enfinite Solutions Limited,

P.O Box 21405 - 00100,

Nairobi, Kenya;

Email: [george@enfinitesolutions.com](mailto:george@enfinitesolutions.com);

Tel: +254-720-890961.

## 8. Amendments

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

8.3 We may notify you of significant changes to this policy by email.

## 9. Our details

9.1 This website/application is owned and operated by Enfinite Solutions Limited.

9.2 We are registered in Kenya under registration number C.143966, and our registered office is at Heri Apartments, Getathuru Road.

9.3 You can contact us:

- by post, to P.O Box 21405 - 00100 Nairobi, Kenya;
- using our website contact form;

- by telephone, on the contact number published on our website; or
- by email, using the email address published on our website.

## **10. Data protection officer**

10.1 Our data protection officer's contact details are:

Email: [george@enfinitesolutions.com](mailto:george@enfinitesolutions.com);

Tel: +254-720-890961