



## **THE ICX KENYA DATA PRIVACY POLICY**

This Policy explains what happens to any personal data that you provide to us, or that we collect from you whilst you visit our site and how we use cookies on this website.

ICX Kenya is committed to safeguarding and preserving the privacy of visitors to our website and our clients.

We do update this Policy from time to time so please do review this Policy regularly.

### **Information that we collect**

In running and maintaining our website and newsletter we may collect, store and process the following data about you and from you:

Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.

We may use cookies where appropriate to gather information about your computer in order to assist us in improving our website.

You can adjust the settings on your computer to decline any cookies if you wish. This can be done within the “*settings*” section of your computer. For more information, please read the advice at *AboutCookies.org*.

If you sign up for our newsletter, which is administered through MailChimp, we will store some of your information, including your email address, IP address and certain information about the links you click on within the emails we send you.

### **How we use data collected**

The information we collect is used to analyze trends, administer the site, track users’ movement and gather broad demographic information for internal use.

### **What we collect**

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- If you have consented to receive marketing communications from us, we will use your contact information for this purpose. You are always free to unsubscribe from receiving communications at any time by following the instructions contained within the email or by emailing us. We will never rent or sell your data.

### **Information you give to us**

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other services or products we offer that are similar to those that you have already purchased or enquired about;
- to provide you with information about services or products we feel may interest you;
- to notify you about changes to our services and products;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

### **Subscriptions**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us.

### **Data Security**

Our information security policies and procedures follow international standards, and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

We ensure that the data we store is encrypted and our systems are audited periodically. The access to personal data is monitored, recorded and restricted to only those employees who need such access in the course of their work. We shall also integrate necessary safeguards into data processing by default.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

### **Disclosure of your information**

We may share your personal information with any member of our group, which means our subsidiaries and affiliates in any part of the world.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them;
- Analytics and search engine providers that assist us in the improvement and optimization of our site;
- Credit reference agencies for the purpose of assessing your credit score only where this is a condition of us entering into a contract with you;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of and other agreements; or to protect the rights, property, or safety of ICX Kenya, our customers, or others. This includes exchanging information with regulators, other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Storage of personal data**

We retain personal information for as long as we reasonably require it for legal or business purposes. In doing so, we take into account all applicable Data Protection Legislation including but not limited to; The Data Protection Act, 2019 Laws of Kenya, The General Data Protection Regulation 2016/679 (GDPR), contractual obligations, and the wishes of our customers. When we no longer need personal information, we securely delete or destroy it.

Your personal information may be transferred to, accessed from and stored in servers and facilities located in another country. ICX Kenya will take the necessary steps intended to ensure that the information continues to be protected wherever it is located.

### **Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us. (We reserve the right to request two forms of ID before releasing any information).

### **Links to third party websites**

We have included links to third party sites for your use and reference. We are not responsible for the privacy policies on these websites. You should be aware that the privacy policies of these sites may differ from our own.

### **Changes to this privacy statement**

The contents of this statement may be altered at any time, at our discretion.

If you have any questions regarding the data privacy policy of ICX Kenya Ltd then please contact us at [tellmemore@icxkenya.co.ke](mailto:tellmemore@icxkenya.co.ke)