

Introduction

AFRICA TRADING ACADEMY values your personal and confidential information. We are committed to protecting this information with adequate protection and use it only for the purposes stipulated in this Privacy Policy. This Privacy Policy will help you understand what personal data is collected and processed, how its protected, how we use it and what rights are made available to you regarding your personal data.

This Privacy Policy (**'Policy'**) explains how **AFRICA TRADING ACADEMY** (collectively, with its subsidiaries and affiliates, **'AFRICA TRADING ACADEMY', 'we', 'us', 'our'**) a Company incorporated under the laws of the Republic of Kenya being a Data Controller, collects and processes your personal information, i.e. information collected online and offline, in accordance with the General Data Protection Regulation and the applicable Data Protection Laws of the Republic of Kenya (**'the Law'**).

Definitions of terms used in Policy:

'Data Controller' means the person or organization which determines when, why and how to process Personal Data and implements appropriate technical and organizational measures to comply with the Law;

'Data Protection Officer' means the person who is formally appointed with the purpose of ensuring that we are aware of and comply with our data protection responsibilities and obligations according to the Law;

'Data Subject' means a living, identified or identifiable natural person about whom we hold Personal Data;

'Personal data' means data about the Data Subject who can be identified:

- from that data; or
- from that data and other information to which we have or are likely to have access;

‘Processing’ means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘Special Categories of Personal Data’ means the information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data;

For the purposes of this Policy, Personal Data includes Special Categories of Personal Data.

‘Third Party’ means the recipient of your Personal Data as defined below.

The kind of information we collect about you:

The purpose of the Processing of your Personal Data is largely based on each of our services that you have requested, used or intend to use:

- Information provided when submitting to ‘BOOK A STRATEGY SESSION’ or contacting us through our website e.g. Name, Email Address
- Information gathered from your use of our website or through Google Analytics, by using cookies e.g. IP Address, Mobile Device Id, Referral Source, Page Views
- Information gathered from transactions and agreements between us for providing our services and implementing our services e.g. VAT number, Name, Address, ID, Biography

We do not collect or process Personal Data of children without prior consent from their parents or legal guardian.

On what legal basis do we process your Personal Data:

As Data Controllers we may collect and process your Personal Data for any or all of the following purposes:

- **Legal obligations:** Obligations that apply for activities that require us to process Personal Data, e.g. obligation to keep accounting records according to the Kenya Tax Authorities;
- **Consent:** You have been given consent to the processing of your Personal Data for a specific purpose e.g. request made on our website, respond to your queries made, send email notifications and commercial information requested.

Consent may be withdrawn at any time by contacting our Data Protection Officer at the contact details provided below or informing us directly;

- **Legitimate Interests:** Personal Data may be necessary for the purposes of our legitimate interests or a third party's to execute, promote, assess and advance our services (e.g. legal claims), except where these interests are overridden by your interests or fundamental rights and freedoms, especially in cases where the Data Subject is a child;

Send company newsletter and updates that we deem would be of interest, send general commercial communication that are not deemed as advertising, Handle complaints and enquiries made by you or about you, Improving your browser experience;

- **Contractual Obligations:** For the commencement and continuation of services, between us and you as a client or as a service provider, we require some personal data from you in order to deliver this service

Who Receives your Personal Data:

Your Personal Data may sometimes be shared or made accessible to the following Third Parties in order for us to perform our services to the highest standard possible:

- Employees or affiliates or partners that need access to fulfill the purposes set out above;

In case of an absence of your consent, your Personal Data will not be disclosed to any Third Party, other than the above-mentioned, unless the disclosure is required and/or mandatory under the provisions of any legislation, regulation or upon governmental, supervisory, competent authority request.

Our employees have signed a Confidentiality and Non – Disclosure Agreement.

When we enter into agreement with a Third Party that requires your Personal Data to be processed by that Third Party, we enter into a processing agreement with that party in order to ensure that they process the Personal Data strictly according to our instructions and to implement the appropriate administrative, physical and technical measures to protect the Personal Data from unauthorized or accidental use, collection, access, damage, loss or disclosure.

Retention of Personal Data:

We will cease to retain your Personal Data or remove the means by which the Personal Data can be associated with you, after seven years (7) where your relationship with us has been terminated and/or as soon as it is reasonable to assume that such retention no longer serves the purposes for which the Personal Data were collected and are no longer necessary for legal or business purposes (except where retention is permitted or required by the Law and/or other applicable laws).

Protection of Personal Data:

To safeguard your Personal Data from unauthorized access, collection, use, damage, loss, disclosure, copying or similar risks, we have introduced appropriate administrative, physical and technical measures such as up to date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of Personal Data to Third Parties. We also allow access to Personal Data only to those employees who need to know such data and they will only process your Personal Data on our instructions.

However, no method of transmission over the internet or method of electronic storage is completely secure. While security cannot be guaranteed, we try to protect the security of the Data Subject's Personal Data and we constantly review and enhance our information security measures.

Your rights in relation to your Personal Data:

Right to access

Request access to your Personal Data, this enables you to receive a copy of your Personal Data that we hold about you.

Right to rectification

Request to correct or update any of your Personal Data which we hold.

Right to data portability

Request the transfer of your Personal Data to another party.

Right to erasure

Request to delete your Personal Data. However, we may need to retain certain information for legal or administrative purposes, such as record keeping and detect fraudulent activities.

Right to restrict processing

Request to restrict the use of your Personal Data.

Right to object

You have the right to object to the collection and use of your Personal Data.

Right to lodge a complaint

You have the right to lodge a complaint about the use of your Personal Data by contacting the Office of the Commissioner for Personal Data Protection in Kenya at the contact details below:

Office address: Commodore Suites, Wood Avenue 3rd Floor Nairobi, Kenya

Postal address: P.O. Box 7720-00200 Nairobi, Kenya

Tel: +254 732 060833

Email: info@africatradingacademy.com

If you wish to exercise any of your rights, you may contact our Data Protection Officer in writing or via email at the contact details provided below:

Address: Commodore Suites, Wood Avenue 3rd Floor Nairobi, Kenya

Email: info@africatradingacademy.com

The Data Protection Officer has the right to require the individual making the request to provide certain identification documents/information to be able to verify his/her identity.

The Data Protection Officer will respond to your requests within thirty (30) days after receiving your email/letter.

Effect of Policy and Changes to Policy:

We keep this Policy under review, and we may modify it from time to time without any prior notice. You should review our Policy on our website periodically to ensure that you are aware of any such modifications/updates.

COOKIES POLICY

Our website uses cookie technology. Cookies are small files saved to your computer or mobile device that track, save and store information as well as your interactions and usage of our website. The primary purpose for collection of data from users to our site is to allow us to provide a smooth efficient and personalized experience while using our site. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive, they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

We also collect other forms of non-personal information such as browsers used to access our website, search terms used to find the website, traffic referrals and links to our website. Cookies collected by us are used to enable certain functions and tools of our website, assist in the navigation of the website, track resources and data used on this site and remember computer settings. You may prevent your computer from accepting cookies by modifying the properties on your web browser (see your browser's "Help" option on how to do this).

We also use the services of Google Analytics software to analyze traffic to our website. Neither of these programs creates individual profile for visitors, nor do we collect any personally identification information using these services. Data collected regarding site usage is compiled in aggregate to improve the performance of the website. If you do not wish your information to be included in this aggregated data through Google Analytics, modify the properties on your web browser to prevent your computer or mobile device from accepting cookies. Please read the Google privacy policy.

Types of Cookies

Strictly Necessary Cookies:

These cookies are necessary for the website in order to enable you to use certain features of the website, such as request specific services, setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Functionality Cookies:

These are used to allow the website to remember choices you make (such as language) and provide enhanced features to improve your web experience.

Navigation Cookies:

These cookies enable the site to function correctly and are used to gather information about how visitors use the site. This information is used to compile reports and help us to improve the site. Cookies gather information in anonymous form, including the number of visitors to the site, where visitors came from and the pages they viewed.

Analytical Cookies:

These cookies are used to produce statistical analyses of the way users navigate the site (using computers or mobile devices), the number of pages viewed, or the number of clicks made on a page during navigation of a site.

Disabling Cookies

You can prevent the setting cookies by adjusting the settings on your browser (see your browser's "Help" option on how to do this). Be aware that disabling cookies may affect the functionality of this and other websites that you visit.