

# **Ushuru Masterclass Kenya Limited Digital Privacy Notice**

Protecting your personal information is important to us. The following guidelines set forth our general privacy practices and principles that apply to information we collect through the any of our products and services.

We utilize administrative, technical, and physical safeguards to protect your information. We protect information submitted to us, both during transmission and once we receive it.

This privacy notice also details choices available to you regarding the use of, your access to, and how to update and correct your personal information.

If you enter into another business relationship with us, or an Ushuru Masterclass Kenya Limited independently-owned and operated franchisee, including through our nationwide network of offices, we will make you aware of the privacy practices and principles that apply to that particular business or relationship.

**Special Note to Parents:** Because of the nature of the services we provide, we do not market our services to persons under the age of 18, nor do we knowingly collect information from persons under the age of 18.

If you have questions or complaints regarding our privacy practices or principles, please contact us by emailing us on <a href="mailto:tax@ushuru.co.ke">tax@ushuru.co.ke</a>

#### What information do we collect?

As part of providing products and services to you, we may collect information, including personal information, about you, your spouse, your dependents, or your business when you use our services.

# Where do we get this information?

You provide most of the information we collect. We also receive information through certain digital technologies when you interact with us. Finally, other companies and government entities may share information with us.

#### How do we use your information?

We use your information to provide you the products and services you request. We may also use your information, as permitted by law, including: to service and report on your account; offer you relevant information, products, or services; and enhance our products and services. These activities may be performed by us or a service provider acting on our behalf.



### Who do we share your information with?

The privacy and security of your information is important to us. We do not sell or rent your information. We may disclose your information as permitted by law or with your consent to other Ushuru Masterclass Kenya Limited companies or to third parties with whom we have a written contract limiting the use and disclosure of your information. We may share your information to support the products and services you request or provide you information on products and services that may benefit you.

# What types of web and wireless technologies (including cookies) do we use?

We, and our service providers, may use commonly-used technologies, such as cookies or similar technologies, to remember you and to personalize your experience with features and advertisements. We, and our service providers, use these technologies to help us know your usage patterns, track your preferences, and analyze how you use our services. We may receive reports on an individual or aggregate basis based on these technologies. You may opt-out of some of these technologies.

### How do we secure your information?

The security of your personal information is important to us. We utilize administrative, technical, and physical safeguards to protect your information. If you have any questions about the security of our services, you can contact us by emailing us on <a href="mailto:texture">texture</a>.

### How long do we keep your information?

In accordance with applicable laws, we keep your information for as long as needed to serve you, maintain your account, as needed to operate our business, or to improve our offerings or develop new ones.

# Business partners' products and services, including social media features

This Privacy Notice does not apply to products or services offered by our business partners on or through our services such as banks and mobile money providers. You will be able to recognize when a business partner is associated with your transaction when its logo appears or is shown with our logo. You should carefully read the privacy notices and any terms and conditions applicable to such business partner's products or services. When you request products or services from such companies, you give us permission to provide these business partners with information about you necessary to fulfill or process your request.

# **Updating or deleting your information**

You may contact us regarding your information by emailing <a href="mailto:tax@ushuru.co.ke">tax@ushuru.co.ke</a>

# **Opting-Out**



You may choose to limit our use or our ability to share your information in certain circumstances. Our ability to offer you certain products and services and your experience may be affected by your choice. To opt out of electronic communications, email tax@ushuru.co.ke.

#### ACCESSING OUR SERVICES FROM OUTSIDE KENYA

We process your information to provide the products and services you request and for our legitimate business interests, including marketing and tax preparation fraud prevention.

Our services are hosted on servers located in Kenya. We also use service providers located in Kenya to bring you our products and services. The transfer of your information to Kenya is necessary to deliver our products and services. Please be aware that the laws in Kenya may not provide the same level of protection to your personal information as your home country.

If you are accessing our products or services from the European Union, you have certain rights regarding the processing of your personal information. For instance, if the information you provide contains special categories of personal data, we will only process it with your explicit consent, which can be withdrawn at any time. You have the following additional rights:

- You have the right to access and correct your information.
- You have the right to obtain erasure of your information, object to or restrict processing activities related to your information, or withdraw your consent to the processing of your information after you have provided it.
- You have the right to obtain a copy of your information in a structured, commonly used, machine readable format.
- You have the right to lodge a complaint with your local supervisory authority regarding our processing of your information.

To exercise your rights, or if you otherwise have questions about the processing of your personal data, you may contact us at <a href="mailto:tax@ushuru.co.ke">tax@ushuru.co.ke</a>

#### **CONTACT US**

If you have questions or concerns regarding this Privacy Notice, contact us by emailing us tax@ushuru.co.ke with our address at

Ushuru Masterclass Kenya Limited Lowerhill Duplex, 61 Upperhill www.ushuru.co.ke



We may update this Privacy Notice to reflect changes to our information practices. If we make a material change to this Privacy Notice, including a material change in the way we use any personal information collected, we will notify you by using one of the following methods at least thirty (30) days prior to the effective date of such change: (1) we will post a notice on our website describing the change; or (2) we will send you an email notifying you of the change.

#### **EFFECTIVE DATE**

This Privacy Notice is effective January 1, 2020.