

# Privacy Policy

## General

The Vipingo Development Limited (hereinafter; Vipingo Development) Privacy Policy is designed to tell you about practices regarding the collection, use and disclosure of information that you may provide via the Vipingo Development Limited website and social media pages. Whenever you use this site, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy.

## Ways that Vipingo Development Limited collects information

Some areas of the site require you to actively submit information in order for you to benefit from specific features (such as the range of online services). You will be informed at each information collection point what information is required and what information is optional.

Some of this information may be personal (information that can be uniquely identified with you, such as your full name, address, email address, phone number etc).

Vipingo Development Limited only collects such information when you choose to supply it to them.

Information is also gathered without you actively providing it, through the use of various technologies and methods such as Internet Protocol (IP) addresses and cookies. These methods do not collect or store personal information.

An IP address is a number assigned to your computer by your Internet Service Provider (ISP), so you can access the internet. It is generally considered to be non-personally identifiable information, because in most cases an IP address is dynamic (changing each time you connect to the internet), rather than static (unique to a particular user's computer).

Vipingo Development Limited uses your IP address to diagnose problems with their server, report aggregate information, and determine the fastest route for your computer to use in connecting to the site, and to administer and improve the site.

## Page tagging

Vipingo Development Limited uses JavaScript page tags to aggregate and analyse customer usage patterns on the website. This provides Vipingo Development Limited with data on your site usage and behaviour. Vipingo Development Limited uses this information to make changes to the layout of the website and to the information in it. This process does not collect any personal or identifiable information about users. You can disable JavaScript on your computer, however disabling JavaScript may affect your ability to access some Vipingo Development Limited online tools and services.

Sometimes Vipingo Development Limited tags pages on sites used to promote various campaigns. These tags are provided by the advertising management partner, DoubleClick. These tags enable DoubleClick to recognise a unique cookie on your browser, which in turn enables Vipingo Development Limited to learn which advertisements bring users to the website. The cookie was placed by Vipingo Development, or by another advertiser who

works with DoubleClick. With this technology, the information that Vipingo Development Limited collects and shares is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or email address. There is more information about DoubleClick - including information about how to opt out of these technologies - on their website.

### **Monitoring of email**

Vipingo Development Limited may monitor email communications with Vipingo Development Limited (this includes any Vipingo Development member of staff). Any such monitoring will take place in accordance with the law.

### **Web statistics**

Vipingo Development Limited uses log files generated by the web servers to analyse site usage and statistics but the files do not identify any personal information. Log file analysis helps Vipingo Development Limited to understand usage patterns on the website and to make improvements to the service.

### **Disclosure**

Except as otherwise stated, Vipingo Development Limited may use information you provide via this site to improve the content, to customise the site to your preferences, to communicate information to you (if you have requested it), for internal marketing and research purposes, and for the purposes specified in this Privacy Policy.

Vipingo Development Limited does not disclose any information you provide via the site to any third parties or other Government departments except where:

- such disclosures are necessary to fulfil Vipingo Development's service obligations to you, in which case Vipingo Development Limited will require such third parties to agree to treat it in accordance with this Privacy Policy
- required by applicable laws, courts orders, or Government regulations (for example, to prevent or detect crime)
- you give Vipingo Development Limited permission to do so

### **Access to and correction of personal information**

Vipingo Development Limited will take all reasonable steps in accordance with legal obligations to update or correct, personally identifiable information that you submit via this site.

You have a right to ask to see details of any personal information that Vipingo Development Limited holds about you. If you wish to do so please contact the Vipingo Development Limited office that you have been dealing with.

### **Liability**

Vipingo Development Limited will not be liable for defamation or any other legal action arising from content published- by persons who are not agents of Vipingo Development- on this website. Vipingo Development Limited will not indemnify any person who posts, comments or otherwise causes to be published unsolicited material on the website, against any direct or indirect legal claims arising from such publications.

## **Security**

Vipingo Development Limited has a legal duty to protect the confidentiality of customer's information. Vipingo Development Limited takes all reasonable steps to protect any information you submit via the website, both online and offline, in accordance with Kenyan Law, international best practice and general principles of law recognized by civilized states.

Vipingo Development Limited takes all appropriate steps to protect your personally identifiable information as you transmit your information from your computer to the Vipingo Development Limited site and to protect such information for loss, misuse, and unauthorised access, disclosure, alteration, or destruction. Vipingo Development Limited uses leading technologies and encryption software to safeguard your data, and operate strict security standards to prevent any unauthorised access to it.

Where you use passwords, ID numbers, or other special access features on this site, you also have a responsibility to take reasonable steps to safeguard them.

## **Links to other websites**

This site contains links and references to other websites. Please be aware that this Privacy Policy does not apply to those websites and Vipingo Development Limited encourages you to read the Privacy Policy of every website you visit.

## **Notification of changes to the Privacy Policy**

Vipingo Development Limited will post details of any changes to the Privacy Policy on the website to help ensure you are always aware of the information Vipingo Development Limited collects, how Vipingo Development Limited uses it, and in what circumstances, if any, Vipingo Development Limited share it with other parties.

This Privacy Policy was last updated December 2020.