

## **Privacy Policy**

### **Introduction**

Acorn Investment Management Limited (“AIML”), together with its affiliate entities respect your privacy and is committed to the protection and security of your personal data (“Personal Data”) in accordance with the Data Privacy Act, 2019, of the Laws of Kenya and any other Regulations issued from time to time.

### **Purpose of our Privacy Policy**

This privacy policy specifies the personal data that we ask you to provide in order to participate in the services offered on Vuka and governs how we treat your personal data.

### **Acceptance**

You indicate your consent to the terms of this Privacy Policy in various ways, depending on your use of the services offered by the Platform. By accessing and using the Vuka Platform, you are acknowledging that you have read and understood this Privacy Policy and agree to be legally bound by it. Such access constitutes your agreement to be bound by this Privacy Policy.

If you register as a member on our Platform, during the registration process you will be asked to confirm that you have reviewed this Privacy Policy and that you agree to its terms. Your consent to the terms of this privacy policy creates legal obligations for you and for us. If you do not agree with the terms of this privacy policy, please do not use our Platform. This Platform is not intended for children, and we do not knowingly collect data relating to children.

### **Data Collection**

We may collect, process, use, store and transfer different kinds of personal data about you, which we have grouped together as follows: -

- Contact Data includes email address, postal address, and telephone number.
- Identity Data includes first name, maiden name, last name or similar identifier, identification number/alien card number, KRA pin number, date of birth and gender.
- Financial Data includes information relating to your financial capacity, bank account number and payment card details.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Platform.
- Profile Data includes your username and password, instructions, purchases, or sales made by you, your interests, preferences, feedback, and survey responses.

We do not collect any Sensitive Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, information about your health and genetic and biometric data).

By submitting your Personal data pursuant to any of your dealings with AIML or by accessing our Platform, you consent to the collection, use, storage, and all other forms of processing of your personal data in accordance with this privacy policy. Any disclosure of personal data pertaining to another person (such as beneficiaries, next of kin or contact persons) shall be construed as bearing the consent of such third party.

### **Failure to provide personal data**

Where we need to collect personal data by law, or under the Terms and Conditions, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel the service you have with us.

### **Use and Purpose of Personal Data**

- to carry out our obligations arising from any contracts entered into between you and us;
- to provide you with information about other products we offer that are similar to those that you have already subscribed to or enquired about;
- to provide you with information about products we feel may interest you;
- to notify you about changes to our products;
- to ensure that content from our platform is presented in the most effective manner for you and for your device;
- to respond to your queries, requests and/or complaints;
- to comply with the mandatory and legal reportorial obligations to government agencies and regulatory bodies; and
- to process information for statistical, analytical, advertising, and market opinion research purposes.

### **Sharing and Disclosure**

Insofar as you have provided your consent or when we are otherwise legally entitled to do so, we will share your Personal data with the affiliated entities and subsidiaries of AIML where applicable, for the purposes indicated above.

Your Personal data possessed by AIML shall be kept confidential. However, it may be necessary for the AIML to disclose and transfer your Personal data to third party companies, entities, or service providers engaged by the AIML to perform certain services on its behalf, including the following: -

- Government agencies;
- Banking and financial institutions;
- External advisors and other professional advisors, such as auditors and legal firms and;
- Service Providers.

### **Inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This Platform may include links to third-party Platforms, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party Platforms and are not responsible for their privacy statements. When you leave our Platform, we encourage you to read the privacy policy of every Platform you visit.

### **Retention and Disposal**

AIML takes all necessary technical, organizational, and physical measures to protect the confidentiality and security of your personal data. These efforts include but are not necessarily limited to: (i) storing your personal data in secure operating environments that are not available to the public and that are only accessible to authorized employees, and our agents and contractors; and (ii) disposing of the documents containing your personal data through shredding or such other similar modes of secure disposal that prevents unauthorized access, further processing or public disclosure. AIML shall retain your personal

data as long as you continue to be legally related with the AIML or until any disputes involving the same have been judicially resolved with finality.

**Use of Cookies**

Our Platform uses “Cookies” to identify the areas of our Platform that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to personalize the content that you see on our Platform. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our Platform correctly or at all. We never place personal data in Cookies.

**Marketing Communication**

We may use your identity, contact, technical, and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing) and convey to you.

**Complaints, Questions and Comments**

AIML undertakes to respond to reasonable requests to review your personal data collected by us and to correct any inaccuracies, amend or delete any entry in accordance with your rights under the Data Privacy Act,2019 of the Laws of Kenya. Should you have any questions or comments about how AIML processes your Personal data, you may contact :.....

You have the right to make a complaint at any time with the Office of the Data Protection Commissioner (ODPC). We would, however, appreciate the chance to deal with your concerns before you approach the ODPC therefore, please contact us in the first instance.

**Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be posted on our Platform, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Platform following the alterations. We recommend that you check this page regularly to keep up to date.