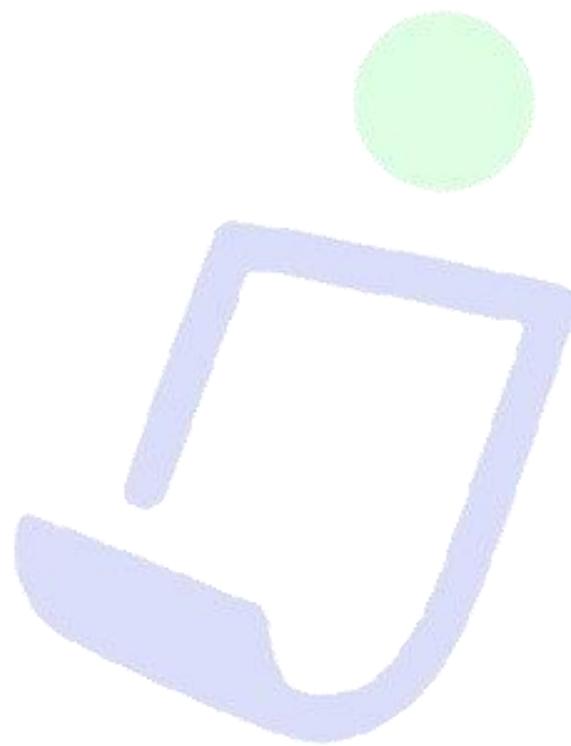


INVOSOKO AFRICA



Data Protection Policy

1. Purpose

The purpose of this Data Protection Policy is to ensure that Invosoko Africa, a registered company operating in Kenya, handles personal data responsibly, lawfully, and in compliance with the Data Protection Act, 2019, any other applicable Kenyan regulations and conforms to best global standards or regulations i.e., GDPR. This policy outlines the principles for collecting, processing, storing, and sharing personal data, ensuring privacy and safeguarding individuals' rights.

2. Scope

This policy applies to all employees, contractors, and third parties who process personal data on behalf of Invosoko Africa. It covers all personal data collected, processed, and stored by the company, whether it belongs to employees, customers, vendors, or other third parties.

3. Legal Framework

This policy aligns with the following key regulations:

- a) **Data Protection Act, 2019**
- b) **General Data Protection Regulation (GDPR)** (for international operations)

4. Definitions

- a) **Personal Data:** Any information that can be used to identify an individual, either directly or indirectly (e.g., name, ID number, location data, email).
- b) **Data Subject:** The individual whose personal data is being collected or processed.
- c) **Data Controller:** Invosoko Africa, which determines the purpose and means of processing personal data.
- d) **Data Processor:** Any third-party service provider or vendor processing personal data on behalf of Invosoko Africa.

- e) **Processing:** Any action performed on personal data, including collection, storage, modification, sharing, or destruction.

5. Principles of Data Protection

Invosoko Africa is committed to upholding the following principles when handling personal data:

- a) **Lawfulness, Fairness, and Transparency:** Personal data must be processed lawfully, fairly, and in a transparent manner.
- b) **Purpose Limitation:** Data will only be collected for specified, explicit, and legitimate purposes.
- c) **Data Minimization:** Only the necessary personal data for the intended purpose will be collected and processed.
- d) **Accuracy:** Personal data must be accurate and kept up to date where necessary.
- e) **Storage Limitation:** Personal data will be stored only as long as necessary for the intended purpose.
- f) **Integrity and Confidentiality:** Personal data will be processed in a secure manner, using appropriate technical and organizational measures to prevent unauthorized access, loss, or damage.

6. Data Collection and Processing

- a) **Consent:** Personal data will only be collected after obtaining explicit consent from the data subject, unless another legal basis applies.
- b) **Purpose of Collection:** Personal data will be collected solely for legitimate business purposes, including but not limited to employment, service delivery, marketing, and customer management.
- c) **Use of Personal Data:** Personal data will only be used for the purpose it was collected unless explicit consent is obtained from the data subject to use it for another purpose.

7. Rights of Data Subjects

Invosoko Africa will respect the following rights of data subjects:

- a) **Right to Access:** Data subjects have the right to access their personal data held by the company.
- b) **Right to Rectification:** Data subjects can request correction of inaccurate or incomplete personal data.
- c) **Right to Erasure:** Data subjects can request deletion of their personal data under certain circumstances.
- d) **Right to Data Portability:** Data subjects can request transfer of their personal data to another service provider.
- e) **Right to Object:** Data subjects can object to the processing of their personal data, including for direct marketing.
- f) **Right to Withdraw Consent:** Data subjects can withdraw consent at any time.

8. Data Storage and Security

- a) **Data Security:** Invosoko Africa will implement appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, or destruction.
- b) **Data Breach Response:** In the event of a data breach, Invosoko Africa will notify the affected data subjects and the relevant regulatory authority within 72 hours of becoming aware of the breach.
- c) **Data Storage Location:** Personal data will be stored in secure systems, and any storage of data outside Kenya will comply with applicable laws.

9. Third-Party Processing

- a) **Vendor Management:** Any third-party vendors handling personal data on behalf of Invosoko Africa will be required to sign data processing agreements, ensuring they comply with data protection regulations.
- b) **Cross-Border Transfers:** Any transfers of personal data outside of Kenya must be in compliance with the Data Protection Act, 2019, ensuring that the data is adequately protected.

10. Data Retention

Invosoko Africa will retain personal data only for as long as necessary to fulfil the

purpose for which it was collected, unless required by law. Data will be securely deleted or anonymized when no longer required.

11. Employee Responsibilities

- a) Employees must adhere to this policy and report any security incidents or potential breaches immediately.
- b) Regular training will be provided to ensure employees understand their obligations concerning data protection and privacy.

12. Data Protection Officer

Invosoko Africa will appoint a Data Protection Officer (DPO) responsible for overseeing the implementation of this policy, ensuring compliance with applicable laws, and acting as the point of contact for data subjects and regulatory authorities.

13. Policy Review and Updates

This policy will be reviewed annually or whenever significant changes in the legal, regulatory, or business environment occur. Any updates will be communicated to all employees and relevant stakeholders.