

PRIVACY POLICY

Privacy Policy

At FURWEL TECHNOLOGIES (we, us, Furwel Technologies, Furwel, FurwelTech), we understand that your privacy is very important to you. That is why we are committed to protecting and respecting the privacy of all users of our websites, apps and any other services, we provide (“our Services”).

Our Privacy Policy, which is set out below, explains what information and personal data we may collect from you, as well as how we may use or share any information that we have collected or you have provided to us. Please note that we are only describing our own practices. This policy does not apply to third parties, including other companies you might interact with on or through our services.

When you use and provide information to us via our Services, you are accepting and consenting to our processing of your information in accordance with this Privacy Policy.

Please read this entire policy carefully. When registering an account, or using our websites, apps and services, you are agreeing to the practices described below.

For the purpose of the Kenya Data Protection Act 2019 (the Act), the data controller is Furwel Technologies, a partnership registered in Kenya, with registered company number BN/2016/425520, whose registered office is located at Transcom Sacco House 4TH Floor, Latema Road off Tom Mboya Street Nairobi.

If you don't understand any parts of the policy or you have any questions, please do not hesitate to contact us at Admin@furwel.co.ke.

Information we may collect from you

We may collect and process the following data about you:

Information that you provide to us, such as your name, address, email address and telephone number, age, username, password & other registration information, financial & credit card information, personal description, details of your household or business, details of any fire & security systems you may have and any information about you or your property revealed

in photographs and/or video and/or audio recordings of you or your property and any persons or objects therewith which you provide to us or which the service provider takes or records before, during and/or after the provision of the services in accordance with the terms and conditions of the services and any other information that you choose to provide voluntarily, when you:

- 1) Register with us and log in through our websites and/or our apps;
- 2) Create an account in our websites and/or our apps;
- 3) Submit a booking enquiry through our websites and/or our apps;
- 4) Make a booking/order through our websites and/or our apps, and during the service itself;
- 5) Complete contact or enquiry forms on, or otherwise provide information via, our websites and/or our apps;
- 6) Subscribe to receive any newsletter we may offer from time to time;
- 7) Complete any voluntary surveys we may ask you to participate in from time to time;
- 8) Send feedback to us via our website and/or our apps;
- 9) Respond to our marketing communications;
- 10) Correspond with us by telephone, post or email or via the instant chat function on our websites and our apps (in which case we will keep a record of that correspondence);
or
- 11) Report a problem with any of our services.

Information that we may collect automatically each time you visit any of our websites, use any of our apps or account systems:

- a) Basic demographic information and preferences (if you opted in for sharing demographic data in your Google Account; technical information, including the type of device) you use, network information, your operating system, the type of browser you use, etc;
- b) Statistical usage data about our users' browsing actions, patterns, interactions and navigation through our apps and/or websites. Please note that this data does not identify any individual;

We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, search

information providers, credit reference agencies, fraud prevention agencies and debt collection agencies) and may receive information about you from them.

How we may use your information

We use the information you give to us:

- 1) To administer any account you may have with us;
- 2) To manage your booking or respond to booking enquiry and to arrange the performance of services by your service provider;
- 3) To carry out our obligations arising from any contracts entered into between you and us;
- 4) To provide you with the information, products and services that you request from us;
- 5) To communicate with you about any comments, complaints, queries or feedback you might have about us or the services;
- 6) To allow you to participate in interactive features of our services, when you choose to do so;
- 7) To notify you about any changes to our terms or our services, to communicate any information about your booking with you and to send you any account-related information and announcements;
- 8) To ensure that content on our websites and our apps is presented in the most effective manner for you and your computer and/or device;
- 9) To provide you with information about goods and services we offer that we feel may interest you by post, telephone, sms or email. We will send that information by sms or email only if:
 - i. You have consented to this; or
 - ii. The information is about products and services similar to those which were the subject of a previous sale or negotiation of a sale to you (and you have not opted out of receiving such marketing messages); or
 - iii. After opting out (and/or unsubscribing) you continue to use our services; or
 - iv. Where we are permitted to do so by law without consent, for example, if you have provided us with a company email address. If you do not want us to use your information in this way, please contact us using our contact form or the contact details in paragraph contact below.

Specifically, we will provide your data to the service provider who is allocated to provide services to you, for the purpose of providing those services. This information may include

- (i) Your name, address and contact details;

- (ii) The details about your property and the services you require, together with any relevant photographs you may have provided;
- (iii) The non-binding quote we have provided to you; and
- (iv) Your payment details.

We use the information about you that we collect automatically:

- 1) To administer our websites and our apps and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 2) To improve our websites, apps and services, to ensure that content is presented in the most effective manner for you and for your computer and device;
- 3) To monitor and improve the security, quality and efficiency of our products and services;
- 4) To allow you to participate in interactive features on the websites and apps, when you choose to do so;
- 5) As part of our efforts to keep our websites and apps safe and secure;
- 6) To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- 7) To make suggestions and recommendations to you about goods or services that may interest you and to otherwise manage our relationship with our clients.

We use the information about you that we collect from other sources in combination with the information you give to us and the information about you that we collect automatically. We will only use such information for the purposes set out above.

Cookies

Our websites and our apps use cookies to distinguish you from other users. This helps us to provide you with the best possible experience when you browse our websites and apps and also allows us to improve our Services..

Where we store and process your information

We are a regional company with operations around the East Africa. By using our services, you are authorizing us to process your information anywhere; our partners or we do business.

All information you provide to us is stored on secure servers provided by Sasahost and Dropbox. Sasahost services are certified as compliant with some of the most rigorous,

industry-accepted security, privacy, and reliability standards. Additional information about Sasahost security is available at <https://www.sasahost.co.ke/>. Dropbox is designed with multiple layers of protection, including secure data transfer, encryption, network configuration and application-level controls distributed across a scalable, secure infrastructure. Additional information about Dropbox's security is available at https://www.dropbox.com/en_GB/business/trust/security/architecture

The data that we collect from you may be transferred to, and stored at, a destination outside the East Africa Community (EAC). It is possible that it may also be processed by staff operating outside the EAC who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the processing of your booking, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites or app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

All payments made through our websites and our apps are processed by our selected third party payment processing services, PayPal and Stripe. Such payments are encrypted using Secure Sockets Layer technology. We may process outstanding payments via, PayPal or Stripe from pre authorisation you made during securing your bookings.

We may process and store information that we have collected anywhere that we or our partners operate, in countries outside of your country of residence. We keep cross-border transfer of personal information to a minimum. In cases where we do transfer any personal information to countries outside of your country of residence, we ensure you that the information is transferred in accordance with this Privacy Policy and according to the applicable laws.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our websites or our apps; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Disclosure of your information

We may disclose your personal information to any member of our group of companies, which means any of the companies registered in East Africa Community: FurwelTech, our ultimate holding company and/or its subsidiaries, any of our subsidiaries (as defined in the Kenya Companies Act 2015) of the relevant company, our ultimate holding company and/or any and all of its subsidiaries, partners, service providers, licensors, licensees or any other third parties related to us.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If all or substantial amount of Furwel Technologies' assets or the assets of our group of companies are acquired by a third party. In this case, personal data held by us about our customers will be one of the transferred assets;
- If when you are paying for a service you decide to pay by credit or debit card, we will share your payment-related information with entities we have engaged to process payments and provide similar financial services (for example fraud prevention). In any such case the service providers are allowed to process only the information solely for the purposes necessary to perform the requested service.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms & Conditions and other agreements; or to protect the rights, property or safety of Furwel Technologies, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- If you do not make payments, that you owe in relation to any services provided to you by the service provider, in which case we may disclose your personal data to credit reference agencies and to fraud prevention agencies for the purposes of fraud prevention. We may also disclose your personal data to debt collection agencies, which may use your information to trace your whereabouts and recover the debts. The information, which we provide to such agencies, may in turn be provided by those agencies to other organizations, which may use your personal data to perform similar checks. Information recorded by fraud prevention agencies may be accessed by organizations in other jurisdictions;
 - Protect clients and/or any third parties;

- If we are forced to protect our own rights, property and operations (enforcing contract performance, pursuing remedies, or limiting damages we may sustain).

Security

We are committed to securing personal information and any data we collect from clients. We use physical, technical and organizational security safeguards to help protect the information that we have collected. However, please note that no server, network or data transmission over the Internet is 100% secure and we cannot guarantee the security of any information transmitted through our websites, apps and account systems and make no assurance about our ability to prevent any such loss or misuse. By choosing to share any information with us, you are accepting this risk.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. You can also exercise the right at any time by contacting us using the contact details in paragraph Contact us below.

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of \$100 /One hundred dollars to meet our costs in providing you with details of the information we hold about you. You can also request that we correct your personal information if it is false. Our team will respond to requests for access or correction of information within 30 days.

Additionally, you can limit the personal information you share. The only way we collect personal information is when you provide it to us voluntarily. You can choose to browse some parts of the Furwel Technologies.' websites without ever creating an account, purchasing a service or otherwise submitting personal information to us. Any personal information that is given to us will generally be retained for as long as your account is active or for as long as it is necessary to provide a service or operate our business, unless a longer retention period is required or permitted by law.

Links to third-party websites

Our websites may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. We welcome any feedback about third-party websites linked to from our websites.

Changes to our Privacy Policy

By submitting your information to us, you consent to the use of that information as set out in this Privacy Policy. If we change our Privacy Policy, we will post the updated policy on this page and may place notices elsewhere within the websites and the apps (such as the home page) for a reasonable period of time, so that you may be aware of the changes.

In the event of any changes, we will also update the “Last updated” date at the top of this Privacy Policy. You should check our Privacy Policy occasionally to ensure that you are happy with any changes we make. Your continued use of the Services following any changes to this Privacy Policy will mean you accept those changes.

Contact us

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to FURWEL TECHNOLOGIES by Mail Box 13366-00100 Nairobi, by email to admin@furwel.co.ke or by telephone on +254 738 827 260.

Signed on the 2ND December 2016 for and on behalf of FURWEL TECHNOLOGIES.

Sadaka Peter
Managing Director