

# PRIVACY POLICY

Last updated May 22, 2020

Thank you for choosing to be part of our community at Elveza Media, doing business as Elveza Media. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [elvezamedia@gmail.com](mailto:elvezamedia@gmail.com).

When you visit our mobile application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Apps and our services.

This privacy policy applies to all information collected through our mobile application, ("Apps"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Services").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

*In Short: We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Apps or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Apps, the choices you make and the products and features you use. The personal information we collect can include the following:

**Social Media Login Data.** We may provide you with the option to register using social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the Information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### Information automatically collected

*In Short: Some information — such as IP address and/or browser and device characteristics — is collected automatically when you visit our Apps.*

We automatically collect certain information when you visit, use or navigate the Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information

about how and when you use our Apps and other technical information. This information is primarily needed to maintain the security and operation of our Apps, and for our internal analytics and reporting purposes.

## Information collected through our Apps

*In Short: We may collect information regarding your geo-location, mobile device, push notifications, when you use our apps.*

If you use our Apps, we may also collect the following information:

- **Geo-Location Information.** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.
- **Push Notifications.** We may request to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

## 2. HOW DO WE USE YOUR INFORMATION?

*In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To send you marketing and promotional communications. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "[WHAT ARE YOUR PRIVACY RIGHTS](#)" below).
- Deliver targeted advertising to you. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- To deliver services to the user. We may use your information to provide you with the requested service.
- For other Business Purposes. We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Apps, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

*In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law

enforcement requirements).

- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Apps, which will enable them to collect data about how you interact with the Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the Apps. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

## 4. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

*In Short: If you choose to register or log in to our services using a social media account, we may have access to certain information about you.*

Our Apps offer you the ability to register and login using your third party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile

information about you from your social media provider. The profile Information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Apps. Please note that we do not control, and are not responsible for, other uses of your personal information by your third party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## 5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

*In Short: We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.*

The Apps may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Apps. You should review the policies of such third parties and contact them directly to respond to your questions.

## 6. HOW LONG DO WE KEEP YOUR INFORMATION?

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 7. HOW DO WE KEEP YOUR INFORMATION SAFE?

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Apps is at your own risk. You should only access the services within a secure environment.

## 8. DO WE COLLECT INFORMATION FROM MINORS?

*In Short: We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Apps, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [elvezamedia@gmail.com](mailto:elvezamedia@gmail.com).

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

*In Short: You may review, change, or terminate your account at any time.*

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## 10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates

your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

## 11.

If you are under 18 years of age, and have a registered account with the Apps, you have the right to request removal of unwanted data that you publicly post on the Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account. We will make sure the data is not publicly displayed on the Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

## 12. DO WE MAKE UPDATES TO THIS POLICY?

*In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## 13. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at [elvezamedia@gmail.com](mailto:elvezamedia@gmail.com) or by post to:

Elveza Media  
Sungura plaza Ngong Town  
Nairobi, Ngong  
Kenya

## HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?



Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please send us an email on [elvezamedia@gmail.com](mailto:elvezamedia@gmail.com). We will respond to your request within 30 days.

