

Privacy Policy

This document defines the scope of privacy and degree of confidentiality protecting the information which the User inputs during account registration at the Website and normal use of the services, programs and facilities of <https://growthpad.irenkenya.com/cookbook> At any time the User can, at his/her discretion, allow or forbid the collection and use of his/her personal information.

By using this Website, the User provides his/her consent to the Company to collect, use and disclose User's personal information according to the rules and provisions of this agreement.

<https://growthpad.irenkenya.com/cookbook> Chakula Chetu recipe book is owned and operated by IREN Kenya (hereinafter "Company") and the Company hereby proclaims and accepts its responsibility to protect the User's private information. This document contains the rules upon which such information is gathered and used. These rules apply to any personal and non-personal information gathered at and/or by the Company.

PERSONAL INFORMATION: The Company requires Users who register to use its services ("Services") offered on the Website to give contact information, such as their name, phone number, and email address ,and billing information (if require), such as billing name and address. Users can update their personal information at any time by contacting growthpad@irenkenya.com

NON-PERSONAL INFORMATION:

- a. The Company also collects non-personal information from you, such as your browser type, the URL of the previous Platform you visited, your ISP, operating system, and your Internet protocol (IP) Address, browser type, browser language, referring URL, features accessed, errors generated, time zone, geo-location data, operating system information, and other such information that is transmitted in the header of the user's HTTP request ("Non-Personal Information"). Non-Personal Information cannot be easily used to personally identify the User.
- b. Cookies are very small text files that are stored on your computer when you visit some websites. We use cookies to help identify your computer so we can tailor your user experience, management of the signup process and user management, general administration including tracking login and usage, managing newsletter or email subscription/surveys, shopping and payment facilities. In some special cases we also use cookies provided by trusted third parties for Analytics, advertising, social media, you can disable any cookies already stored on your computer, but these may stop our Platform from functioning properly.
- c. In general, you can visit <https://growthpad.irenkenya.com/cookbook> without telling us who you are or revealing any information about yourself.

However, our web servers automatically collect the domain names/IP Address of visitors. This information is used to measure the number of visits, average time spent on the site, pages viewed and similar information which is used to measure our services, evaluate performance and improve our content/services.

- d. Most of the cookies we use are so-called session cookies, which are automatically deleted by your browser after the end of your visit to our website. Session cookies provide us with information about visitor behavior on our website, which we analyze. With the knowledge gained, we will make our website more user-friendly, place important content on the most popular pages and develop our marketing strategies according to the interests of our target audience. Other cookies are stored longer on your device and allow us to recognize you as a user during a subsequent visit to our website. We do not pass on information that we receive through our cookies to third parties. By using the “Incognito” or “Private” mode of your browser, or by means of adjusting the settings in your browser, you can prevent the installation of cookies. As a result, some of the facilitation of operating our website will no longer work.
 - e. Our legal basis for the use of cookies is Art. 6 (1) b) GDPR and Data Protection Act, 2019. Our legitimate interest is to optimize our product, increase user experience, enhance our customer support and improve our internal process efficiency.
1. **USE OF USER’S INFORMATION:** The Company uses the information that it collects to set up services for its Users. Users’ email addresses and any personal customer information will not be distributed or shared with third parties except to the extent necessary to provide the User with a requested service, or under circumstances required by law. The Company will disclose User’s personal information when we believe in good faith that any applicable law, regulation, or legal process requires it, or where the Company believes disclosure is necessary to protect or enforce its rights or the rights of another user. We also disclose aggregated User statistics in order to describe our services and reach to prospective partners, advertisers, and other third parties. However, aggregate data is not traceable to the User specifically. The Company may use contractors to help us with our operations. Some or all of these contractors may access our databases of user information. These contractors will enter into an agreement with the Company that places restrictive provisions on their use and disclosure of all information they obtain through the relationship. The Company may share personal information with global partners for the purpose of providing Users with high quality, localized service. The Company may use Non-Personal Information to track the use of the Website and for other internal purposes, such as providing, maintaining, evaluating, and improving the Services and the Website.

2. **THIRD PARTY LINKS:** The Site may contain links to other websites not owned or operated by <https://growthpad.irenkenya.com/cookbook> . If you click on such a link, you may be taken away from the Site to an entirely different website. This Policy applies only to the Site and not to any third-party website that may be accessed through links on the Site. It is important to note that such other websites may not follow the same privacy policies as ours and that we are not responsible for the privacy practices of such other websites. We encourage you to be aware when we link to other websites and to read the privacy policies or statements of each and every such website.

3. **OPT-OUT POLICY:**

a. We will provide you access to your personal data stored by us at any time. If you wish, you will receive it in a structured, commonly-used and machine-readable format. We will be happy to correct, edit, limit, or delete your personal data at your request, provided that no statutory storage requirements are in conflict, or forward them to another responsible office. If your personal data stored with us has been processed incorrectly, out-of-date, or unlawfully, you can restrict its processing by us. Finally, you may change or revoke your consent to the processing of your personal information at any time with future effect. To contact us for any of these concerns, please email us at growthpad@irenkenya.com.

Our legal basis for the disclosure, correction, deletion, limitation of processing and data transmission is the respective request of the data subject.

b. Users can opt out of being contacted by the company, or receiving information from the Company, at any time by sending an email to growthpad@irenkenya.com. The Website offers its visitors and Users a means to choose how it may use information provided. If, at any time after registering for information or ordering services, the User changes his mind about receiving information from <https://growthpad.irenkenya.com/cookbook> or about sharing your information with third parties, send us a request specifying your new choice. Simply send the request to growthpad@irenkenya.com

c. You have the right to complain about the improper processing of your personal data (such as collection, storage, modification, transfer, deletion, etc.) by emailing us at growthpad@irenkenta.com

4. **INTERNATIONAL DATA TRANSFER:** We may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or other regions with laws governing data collection and use that may differ from other countries law, please note that you are transferring information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to Kenya and the use and disclosure of information about you, including personal information, as described in this Privacy Policy.
5. **PERSONAL DATA AND INFORMATION:** We work hard to protect our users from unauthorized access or unauthorized alteration, disclosure, or destruction of information we hold. In particular:
 - a. We encrypt our services
 - b. We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
 - c. We restrict access to personal information to employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
6. **COMPLIANCE AND COOPERATION WITH REGULATORY AUTHORITIES:** We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including national data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.
7. **RETENTION, DELETION OR BLOCKING OF DATA:** We adhere to the principles of purpose limitation and data minimization. Therefore, we only store your personal data for as long as it is necessary to achieve the purposes mentioned here or as long as the many storage periods required by law. After discontinuation of the respective purpose or expiry of these deadlines, the corresponding data will be blocked or deleted in accordance with the statutory provisions.
8. **MINOR USERS:** The Company does not intend to and will not purposely collect, require or request personal information from persons under 18 years of age without permission from parent or legal guardian. If the User is a minor, he/she should not enter his/her

personal information or use the Website in any way prior to obtaining the consent of the parent or legal guardian.

9. **CHANGES TO THESE RULES:** The Company reserves the right to change rules of Privacy Policy at any time without notice. In case of a substantial change of confidentiality rules and policies of use of the User's personal information, the Company shall publish the changes on the Website. The User is advised to refer to the text of this page at each visit to the Website.