

CUSTOMER DATA PRIVACY STATEMENT

Jubilee Holdings Limited (“Jubilee Insurance /We/Us”) respects concerns about how we use the personal and company information we collect from you through our website and through other methods of communication. This privacy statement describes how Jubilee Insurance collects, uses and shares personal information, including sensitive personal data, of users of our website <https://jubileeinsurance.com/ke/ji/> (the “Website”), its subdomains and any products or services offered by Jubilee.

Collection of Information

Jubilee Insurance collects data directly and through intermediaries to enable us to operate effectively and provide you with the best experience possible with our products and services. We may collect information about you in the following ways:

- **Information You Give Us.** Jubilee Insurance may collect information that includes but is not limited to: your name, phone number, email, National Identification (ID)/passport number, age, financial and health information, personal identification number (PIN), occupation, company name and registration number, postal addresses and any other information you provide to us through our Website, in person or by phone regarding any of our products or services.
- **Information We Collect from Other Sources.** We may also receive information from other sources and combine that with information we collect through the Services. For example, if you engage with a separate app or website that uses our API (or whose API we use), we may receive information about you or your connections from that site or app.
- **Information Automatically Collected.** Jubilee Insurance automatically logs information about you and your computer. For example, when visiting our Website, Jubilee Insurance logs your computer operating system type, browser type, browser language, the website you visited before browsing to our Website, pages you viewed, how long you spent on a page, access times, Internet protocol (IP) address, and information about your use of and actions on our Website.
- **Cookies.** Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. Jubilee Insurance uses cookies and similar technologies to see which parts of our Website people use and like and to count visits to our Site. We also use cookies for the following purposes:
 1. Remembering user preferences and settings;
 2. Determining the popularity of content;
 3. Analyzing site traffic and trends; and
 4. Generally understanding the online behaviors and interests of people who interact with our services.

Please note that the Help feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the Web site of its manufacturer. Since cookies allow you to take advantage of some of Jubilee's essential features, we recommend that you leave them turned on.

- **Web Beacons.** Jubilee Insurance may log information using digital images called Web beacons on our Website or in our emails. Jubilee Insurance uses Web beacons to manage cookies, count visits, and to learn what marketing works and what does not. Jubilee also uses Web Beacons to tell if you open or act on our emails.

Use of Personal Information

Jubilee Insurance may use your personal information as follows:

- To operate, maintain, and improve our site, products and services, including but not limited to, facilitating payments, sending receipts, providing products and services (and send related information), develop new features, provide customer support, develop safety features, authenticate Users, enable the use of our online self-service portal, and send product updates and administrative messages.
- To communicate with you, respond to comments, questions, complaints and to provide customer service. In this regard any change of details regarding your personal data should be notified to Jubilee Insurance immediately.
- To send you communications we think will be of interest to you, including information about our products and services, promotions, news, and events of Jubilee Insurance, where permissible and according to local applicable laws. You can unsubscribe from our marketing communications by clicking 'Unsubscribe' on the footer of a Jubilee Insurance marketing email.
- To comply with applicable laws and court orders for example where Jubilee Insurance is served with a court order to provide the court with certain information about you in our possession.
- In the exercise of our rights- Where reasonably necessary, we may use your data to exercise our legal rights and prevent abuse of our service. For example, we may use your data to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- To personalize and improve the Services, including to provide or recommend, features, content, and advertisements. Where this is the case, we will take appropriate measures to protect your personal information in accordance with this Policy.

Sharing of Personal Information

a) Jubilee Insurance shall not disclose your personal information to any third parties other than with your prior consent.

b) Jubilee Insurance may share personal information for legal, protection, and safety purposes which includes complying with the laws of the countries we operate in, as well as to comply with all lawful requests and legal processes.

Retention of Information

We retain your data for as long as we reasonably require it and, in any event for as long as you continue to use our products and services. When you no longer use our products and services, we will delete your data subject to any statutory obligations that may require us to keep the data for a longer period. We may retain logs of automatically collected information (for internal analytics) including: your email address; your tax information; communications with you; and your transactional information (for auditing, tax, and financial purposes). When we no longer have a business reason for retaining data, we will delete or anonymize it.

When you have chosen a password, which allows you to access certain products or services, you are responsible for keeping the password confidential. We advise that you keep your password secret, do not share the password with anyone for any purpose. Our customer service agents will never ask you for your password.

If we receive legal process pertaining to your use of our products and services, we will retain your data for as long as we, in good faith, believe is necessary to comply with the legal process. Similarly, if we believe that you have been involved in wrongdoing, we may preserve your data to defend or assert our rights.

You are in Control

You are in control of your data and how we collect, use or retain your data is entirely up to you. To this end, you:

a) May request that we correct, amend or update any data that we hold of you which is either incorrect or outdated;

b) May request Jubilee Insurance to delete your personal data at any time; All such requests should be forwarded to privacy@jubileekenya.com . We undertake to respond to any request for correction, updating or deletion of personal data submitted by e-mail within three (3) months and will specify the period of data deletion.

However, please note that you will not be able to use any of our products and/or services for which the data deletion request is made.

Security of Personal Information and Data Breach

Personal information and data are handled with care and integrity. Jubilee Insurance has implemented physical, electronic, and managerial procedures to safeguard and secure the information collected. Jubilee Insurance warrants that it will monitor and test its systems from time to time, and further agrees to adjust its data safeguards from time to time in light of relevant circumstances or the results of any relevant testing or monitoring. If we suspect or become aware of any unauthorized access to your data by any unauthorized person or third party, or become aware of any other security breach relating to personal data held by us under this Agreement, we shall immediately notify you in writing and shall fully cooperate with you at our expense to prevent or stop such data breach. In the event of such data breach, Jubilee Insurance shall fully and immediately comply with applicable laws and shall take the appropriate steps to remedy such data breach.

Data Location

Data generated from users and personal information is stored and processed within Kenya. However, where we may need to transfer or process your personal information outside our legal jurisdiction, Jubilee Insurance undertakes to ensure that your personal information is processed or transferred in accordance with the Data Protection Act.

Privacy Policy Updates

Jubilee Insurance reserves the right to change the provisions of this privacy policy at any time. We will alert you that changes have been made by indicating on the privacy policy the date it was last revised. Your use of the Website following the posting of such revised policy shall constitute your acceptance of any such changes. We encourage you to review our privacy policy whenever you visit the Website to guarantee your understanding of how your information may be collected and used.

Contact information

If you have any questions about this statement, please contact us at privacy@jubileekenya.com