

## **DATA PRIVACY POLICY**

This policy was last updated on 19/10/2023.

This Privacy Policy (the "Policy") governs how Longhorn Publishers PLC (hereafter, "Longhorn"), collects, uses, and discloses personal data. Personal data in this context means information relating to an identified or identifiable natural person.

This policy is intended for Longhorn Publishers PLC and its subsidiaries. References within this policy to Longhorn or the Longhorn Group shall be taken to mean Longhorn Publishers PLC and its subsidiaries, or any one of them separately.

### **Personal data collected**

Longhorn collects and uses certain personal data whenever a person interacts with us whether as a customer, supplier, employee or in any other manner. Sometimes personal information is collected when it is provided to Longhorn, but it may also be collected automatically when you visit or interact with Longhorn's services or products.

The data we collect depends on the context of your interactions with Longhorn and the choices you make (including your privacy settings), the products and features you use, your location, and applicable law.

The information we collect may include:

1. Name and contact data - Your name, email address, postal address, phone number, physical address or other similar contact data.
2. Credentials – usernames, passwords, password hints, and similar security information used for authentication and account access.
3. Demographic data - Your age, gender, country, education, work history and preferred language.
4. Payment data - bank account name and number, mobile banking number, debit or credit card number and the security code associated with your credit or debit card.
5. Subscription and licensing data - Information about your subscriptions, licenses, and other entitlements.
6. Interactions - Data about your use of our products. Some data is provided and some is collected or generated automatically. This data may include device and usage data, payment and account history, browse history, device, connectivity, configuration data, IP address, device identifiers (such as the IMEI number for phones), regional and language settings, trouble shooting, help data, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information.
7. Content consumption - the content (e.g. video, music, audio, text books) you access or share with others on our online channels.

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Funzi Road, Industrial Area  
P.O. Box 18033 - 00500 Nairobi, Kenya  
Tel: +254 020 6532579/80/81  
Mobile: +254 722 204 608, +254 708 282 260

[www.longhornpublishers.com](http://www.longhornpublishers.com)  
@longhornpublishers  
@Lhornpublishers  
Longhorn Publishers Plc

Directors: Hon. F.T. Nyamimo (Group Chairman) • Mr. M. Wahome (Group Managing Director) • Centum Investment Co PLC • Ms. E. Miloyo  
• Mr. R. Nyamweya • Mr. A. H. Kassim • Mr. F. Muriimi • Mr. M. Githu



8. Searches and commands - Search queries and commands when you use Longhorn products with search or related productivity functionality.
9. Contacts and relationships – when you use a product to share information or communicate with others or when you provide information on your relationships, such as identifying a user as your child.
10. Social data - Information about your relationships and interactions between you, other people, and organizations, such as types of engagement (e.g., likes, dislikes, events, social media posts etc.) related to people and organizations.
11. Location data - Data about your device's location, which can be either precise or imprecise. For example, location can also be inferred from a device's IP address or data in your account profile that indicates where it is located.

#### **How personal data is used**

We use the personal data we collect to provide, maintain, and improve our products. We may also use personal data to:

- Send you technical notices, general updates, goodwill messages, security alerts, and support and administrative messages (such as changes to our terms, conditions, and policies) and to respond to your comments, questions, and customer service requests.
- Receive and respond to your submissions on our products such as submissions on our websites, web applications and mobile applications, social media and submissions to customer service contacts.
- Permit you to participate in voluntary polls and surveys (we may use third parties to deliver incentives to you to participate in such polls and surveys, and you may be required to provide your contact details to the third party in order to fulfil the incentive offer).
- Communicate with you about products, services, and events offered by Longhorn and others, and provide news and information we think will be of interest to you.
- Monitor and analyse trends, usage, and activities in connection with our products.
- Develop new products and services and enhance current products and services.
- Detect, investigate, and prevent fraudulent transactions and other illegal activities, and protect the rights and property of Longhorn and others.
- Carry out any other purpose described to you at the time of collecting information.
- Analyse and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our products and other websites, and better understand your interests.

The processing of personal data in these uses may be automated or manual, but ordinarily the automated processing will be supported by manual processing.

#### **How personal data is shared**

We may share your personal data:

- In accordance with your directions or consent, such as when you share a link to our content on your profile on social media or with other users of our products;
- With our data processors that host, maintain, manage, or provide other services to us;
- To cooperate with public and government authorities and law enforcement, to respond to a request, or to provide information in accordance to existing laws;
- For other legal reasons, such as to monitor compliance with and enforce our terms and conditions, to protect our rights, privacy, safety, or property, or that of our affiliates, you or others, to protect against criminal activities, and for risk management purposes;
- With our subsidiaries and affiliates (including our holding company, subsidiaries within the group holding company, subsidiaries of our subsidiaries and entities similarly related to Longhorn); and
- In connection with a sale or business transaction, such as to an acquiring entity or its advisors in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We may also share aggregated pseudonymised or anonymised information that cannot reasonably be used to identify you with our service providers.



### **Children**

All our interactions with children align to the data protection requirements for minors. These include consent provided by the child's parent/guardian and age verification. If you have reason to believe that a child has provided personal data to us, please contact us for remedial action.

### **Links to other websites**

Our products may contain links to other websites. Please note that Longhorn is not responsible for the privacy or information security practices of other websites. You should carefully review the applicable privacy and information security policies and notices for any other websites you click through to via our platforms. This Policy applies solely to your personal data collected by Longhorn.

### **Security**

We employ various measures to protect the personal data we collect against loss, theft, breach, and unauthorized use, disclosure, or modification.

If you have set up an account under any of our products, your account is protected by your account password and username. Your password should always be kept secret. In circumstances where it is reasonable to do so, personal data is encrypted or anonymised.

### **Control Your Privacy & Data**

You can make choices about the processing (collection and use) of your data by the Longhorn Group. Your control may however be limited or dependent on the product you use or for other reasons based on applicable law.

Some of the ways in which you control your data are:

1. Marketing emails and alerts

If you no longer want to receive marketing-related emails and alerts from the Longhorn Group, you may opt out/ unsubscribe by following the instructions contained within each such email. We will endeavour to comply with your request as soon as is reasonably practicable. Please note that if you opt-out of receiving marketing-related emails and alerts, we may still send you administrative messages, from which you cannot opt out or unsubscribe while you continue to use products online.

2. Cookies

Our websites will usually present you with an option to select the types of cookies you wish to accept.

Although most web browsers are set to accept some cookies by default, you may also choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies. This could affect the availability and functionality of our products.

### **Data subject requests**

In your use of our products, Longhorn aims to give you more control of your personal data. Our personal data handling complies with the following principles of data protection:

- Right to access – you can ask us whether we are processing your personal data, including where and for what purpose. You can also access an electronic copy of your personal data.
- Right to restrict processing – in certain circumstances, you can ask us to restrict our use of your personal data.
- Right to rectification – you can ask us to correct inaccurate personal data we hold about you.
- Right to erasure (right to be forgotten) – under certain circumstances, you can ask us to erase your personal data.
- Right to data portability – at a cost, you can ask us to provide you with a copy of your personal data in a commonly used electronic format, so that you can transfer it.
- Right to object to automated decision-making – in certain circumstances, you can ask us not to make automated decisions about you based on your personal data, which produce significant legal effects.

It is important to note that the above rights are subject to the applicable laws and regulations.

#### **Data retention**

We retain personal data only as long as is necessary or required by applicable laws and regulations and our Personal Data Retention Schedule (PDRS). The PDRS is constantly reviewed as may be necessitated by changes in operational or legal environment.

#### **Data transfer**

Your personal data may be stored and processed in any country where we have facilities or in which we engage data processors in accordance to the applicable data protection laws and regulations.

#### **Acceptance**

You are required to read, understand and agree to the terms of this Policy before using our products. Your use of our products signifies that you agree to waive your material privacy rights. You also agree not to hold Longhorn liable for use, storage, transfer or other handling of your personal data as provided in this Policy.

#### **Changes to this Policy**

From time to time, we may revise this Policy. Changes may be made for any number of reasons, including to reflect industry initiatives, changes in the law, changes to the scope of our products, give clarity, among other reasons. You can tell when we last updated the Policy by checking the date at the beginning of the Policy. Any changes will become effective when we publish the revised Policy.

#### **Contact us**

If you have any questions concerning this Policy, please contact us through the contact information provided at the end of this Policy.

#### **Appendix**

This policy is intended to be compliant with the Data Protection Act, 2019 (Kenya) and its subsidiary legislation.

#### **DPO Contact Details**

All questions, complaints, concerns, related to privacy at the Longhorn Group may be addressed to the Data Protection Officer (DPO), Danlex Partners LLP, email: [info@danlexpartners.com](mailto:info@danlexpartners.com); [longhorndpo@danlexpartners.com](mailto:longhorndpo@danlexpartners.com)

**This Policy was approved by the Board of Directors on 22 February 2024 and signed on its behalf by**



**Hon. F. I. Nyamimo**  
Chair, Board of Directors



**Mr Ali Hussein Kassim**  
Chair, Audit & Risk Committee