

PRIVACY POLICY

Introduction

Arete Business Advisory Services respects your privacy and is committed to protecting it through our compliance with this privacy policy ("Policy"). Maintaining protection of the data entrusted to our care by our constituents is of the utmost importance to us.

This Policy describes the types of data we may collect from you or that you may provide and describes our policies and practices for collecting, using, protecting, and disclosing that data.

This Policy may change from time to time, so do check the Policy periodically for the most current version. If you have any questions about the meaning or interpretation of this Policy, the English-language version of this Policy is the official text.

Data We Collect About You

We may collect several types of personal data that can be used to identify you ("Personal Data"), including your:

- Name
- Email address
- Telephone number
- Internet connection
- Equipment used to access our Website and usage details

Depending on the type of interaction that you have with us, we may also collect your:

- Gender
- Birth date
- Occupation

Under limited circumstances, we may collect sensitive personal data, such as government ID/Passport numbers.

How We Collect Your Data

We collect Personal Data from:

- Users of our Website.
- Direct interaction with us.

We collect this data:

- Directly when you provide it to us through any interaction offline or in person.
- From our website www.arete-advisory.com (our "Website")
- From other websites that link to our Website.
- Automatically, as you navigate through the Website (data collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies)
- When you use our services
- When you participate in our programs or sign up for and/or attend any events that we host
- From third parties we contract with to provide services on our behalf, such as payment processing services, email marketing services, and software providers; these service providers may change, or new service providers may be added without notice to you
- When you interact with us in another way, for example, contacting us with an inquiry.
- From publicly available resources.

Data You Provide to Us

We collect data you provide when you interact with us, either through our Website or any interaction offline or in person. That data includes:

- Personal data that you provide by making an inquiry;
- Personal data you provide when participating in services available on our Website.
- Personal data you provide when you report a problem with our Website.
- Records and copies of your correspondence (including email, social media posts, and other electronic messages), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your registration to attend and/or participate in our events.
- Personal data you provide when making a payment.
- Details of transactions made through our Website and details of the fulfillment of your orders (you may be required to provide financial personal data before placing an order through our Website)
- Your search queries on our Website.

Features that are developed in the future may result in the collection of additional new personal data. You also may provide data to be published or displayed (hereinafter, "posted") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "User Content").

Your User Content is posted on the Website and transmitted to others at your own risk. We limit access to certain pages and you may set certain privacy settings for this data from your account profile. However, we cannot control the actions of other Website users with whom you may choose to share your User Content.

Usage Details, IP Addresses, Cookies, and Other Technologies

As you navigate through and interact with our Website, we may automatically collect certain data about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The data collected in this way is anonymous. It is aggregated into statistical data to help us improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size, browser statistics, popularity of content, and usage patterns.
- Speed up your searches.
- Recognize you when you return to our Website.

We use cookies (or browser cookies) for this automatic data collection. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

Third-party Advertiser Use of Cookies and Other Tracking Technologies

Some advertisements and offers on our Website may be served by third-party advertisers, ad networks, and ad servers. Additionally, some of the applications accessible from, or on, our Website

may be owned by third parties. These third parties may use cookies alone or in conjunction with other tracking technologies to collect data about our users. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or offer on our Website, you should contact the responsible advertiser directly.

How We Use Your Personal Data

We use data that we collect about you or that you provide to us, including any personal data:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To offer and fulfill our core business purposes, which include:
 - Providing services to you and our other clients
 - Financial processing and billing for our services.
 - Responding to any of your queries.
 - Communicating key organizational messages and keeping you informed generally about our services, unless you opt out of receiving such messages at any time at your sole discretion.
 - Complying with any legal, governmental or regulatory requirements or for use by our legal counsel in connection with legal proceedings.
 - Quality control, training and ensuring our systems are operating effectively.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- To store information about your preferences, allowing us to customize our Website according to your individual interests.
- To help us develop and test updates to this Website and other applications that support our core business purposes.
- In any other way we may describe when you provide the personal data.
- For any other purpose where we have your consent.

Disclosure of Your Personal Data

We may disclose aggregated data about our users, and data that cannot be used to identify any individual, without restriction.

We may disclose personal data that we collect or you provide as described in this Policy:

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them, including:
 - Payment processing vendors.
 - Financial institutions and fiscal agents when processing financial transactions.
 - Software and applications used for administrative functions such as providing online forms/surveys/applications, newsletter services, online learning, webinar/teleconference services, electronic voting.
 - Cloud-based databases used for administrative functions.
 - Email distribution services

- To third parties to promote their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal data confidential and use it only for the purposes for which we disclose it to them.
 - If you do not want us to share your personal data (even when anonymized) with unaffiliated or non-agent third parties for advertising or promotional purposes, you can send an email stating your request to info@arete-advisory.com.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the data.
- With your consent.

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If disclosure is necessary or appropriate to protect the rights, property, or safety of our firm or others. This includes exchanging personal data with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Accessing and Correcting Your Personal Data

Subject to the applicable data protection laws, you have the right to:-

- Correct any personal information we hold on you that is inaccurate, incorrect or out of date.
- Confirm which of your personal information we hold may be processed and to request the identity of any third party who may have access to this information.
- Request that we stop processing your personal information.
- Request that any decision significantly affecting you is not based solely on automated decision making.

Requests relating to the above rights should be sent to us at info@arete-advisory.com.

We may choose not to accommodate a request to change or delete data if we believe the change or deletion would violate any law or legal requirement or cause the data to be incorrect.

If you delete your User Content from the Website, copies of your User Content may remain viewable in cached and archived pages or might have been copied or stored by other Website users. Proper access and use of data provided on our Website, including User Content, is governed by our Terms of Use.

Children Under the Age of 18

Our Website is not intended for children under 18 years. We do not knowingly collect personal data from children under 18 without parental consent. No one under age 18 may provide any personal data to or on our Website.

If you are under 18, do not:

- Use or provide any personal data on our Website or on or through any of its features.
- Register on our Website or make any purchases through our Website.
- Use any of the interactive or public comment features of our Website, or
- Provide any personal data about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal data from a child under 18 without verification of parental consent, we will delete that personal data. If you believe we might have any personal data from or about a child under 18, please contact us at info@arete-advisory.com.

How Long We Retain Your Personal Data

We will only retain your personal data for as long as necessary in the circumstances to fulfill the purposes we collected it for, including to satisfy any legal, regulatory, tax, accounting or reporting requirements. — for instance:

- For a reasonable period to send you information, program information, and marketing materials where you have registered for a conference or other event or we have regular contact with you, and where you have not opted out of this service; or
- As may be needed to enforce or defend contract claims or as is required by applicable law.

In addition, we will hold any anonymized information that can no longer be associated with you indefinitely.

Data Security

We have implemented reasonable technical and operational measures to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. However, the transmission of personal data via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website or over any public network. Any transmission of personal data is at your own risk. Without prejudice to any mandatory legal obligations to which we may be subject, we are not responsible for circumvention of any privacy settings or security measures on our Website.

Changes to Our Privacy Policy

We may change, add, modify or remove portions of this Policy at any time, and such changes shall become effective immediately upon posting on this page. The date the Policy was last revised is identified at the bottom of the policy. It is your responsibility to review this Policy for any changes. By continuing to use our Website, maintain your membership in our clubs, use our services, or participate in our programs, you agree to any changes in the Policy.

Contact Information

Arete Business Advisory Services is domiciled in Nairobi, Kenya. If you have any questions about us, this Policy or practices, please contact us at info@arete-advisory.com.

Last modified: 12 August 2021
