

WIN Pamoja Website Privacy Policy

This Website Privacy Policy (“policy”) describes the types of personal information we may collect about you in the context of your use of winpamoja.com (the “site”), the purposes for which we use the information, and the circumstances in which we may share such information. As used throughout this policy, the term “WIN Pamoja,” “we”, “our” or “us” refers to WIN Pamoja LLC.

When you visit the site, we collect certain personal information about you. As used in this policy, “personal information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household.

COLLECTION OF PERSONAL INFORMATION

The categories below describe the personal information we collect about you and the sources from which we collect those categories of personal information.

Personal Identifiers

Description:

Personal Name, email address, Phone contact, Residential Address, Mailing Address, Kenya ID/Passport number, Date of Birth, Gender

Family member name, Date of Birth, Gender

Sources: You

Device and Online Identifiers

Description: IP address; session ID (session start time)

Sources: You; devices associated with you; third-party information providers

Internet, Browser, and Network Activity

Description: clickstream/online website tracking information; data related to user activity, e.g., browser visits, page views, visits, and unique visitors data; and cookies or other similar technologies

Sources: You; devices associated with you; third-party information providers

Location Data

Description: Region, country, and city

Sources: You; devices associated with you; third-party information providers

USE OF PERSONAL INFORMATION

We may use your information for the following purposes:

- **Providing information to you:** We use the e-mail address you provide through the site to deliver our “Briefings” weekly e-mail to you. If you wish to request historical documents, we will use the e-mail address you provide through the site to enable your request to us.
- **Improving the site:** We use your device and online identifiers, information about your internet, browser, and network activity, and location data to measure technical site performance.
- **Marketing:** We use information about your internet, browser, and network activity for marketing purposes.
- **Operating the site:** We use your IP address, location data, and internet, browser, and network activity to enable our site metrics for site administration and management purposes.

SHARING OF PERSONAL INFORMATION WITH OTHER ENTITIES

We may share personal information about you with other entities, including entities that provide services to us. We do not disclose your personal information collected through the site to other entities, except as described in this policy.

We may share your information with the following types of entities:

- **Service providers:** We engage service providers to assist us with operating the site. These service providers analyze information about our site and your use of the site. Information disclosed for these purposes may include device and online identifiers, information about your internet, browser, and network activity, and location data.
- **Other entities related to legal process and emergency situations:** We may disclose personal information to third parties as permitted by, or to comply with, applicable laws and regulations. Examples include responding to a subpoena or similar legal process, protecting against fraud and cooperating with law enforcement or regulatory authorities. Information disclosed for these purposes may include device and online identifiers, information about your internet, browser, and network activity, and location data.

Applicable law requires that we identify the categories of personal information we share for business purposes. We disclose the following categories of personal information for business purposes: Personal identifiers, device and online identifiers, information about your internet, browser, and network activity, and location data.

INFORMATION SECURITY: HOW WE PROTECT YOUR PRIVACY

WIN Pamoja is committed to protecting the privacy and confidentiality of your personal information. We limit access to your personal information to authorized WIN Pamoja employees or agents and the third parties described above in *Sharing of Personal Information With Other Entities*. We also maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- A group that designs, implements and provides oversight to our information security program;
- The use of specialized technology such as firewalls;
- Testing of the security and operability of products and services before they are introduced to the Internet, as well as ongoing scanning for publicly known vulnerabilities in the technology;
- Internal and external reviews of our Internet sites and services;
- Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;
- Implementing controls to identify, authenticate and authorize access to various systems or sites;
- Protecting information during transmission through various means including, where appropriate, encryption; and
- Providing WIN Pamoja personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

Reporting Security Vulnerabilities

We encourage security professionals to practice responsible disclosure and let us know right away if a vulnerability is discovered on the site. We will investigate all legitimate reports and follow up if more details are required. You can prepare a vulnerability report and email to ask@winpamoja.com.

PRIVACY AND THE INTERNET

The following additional information will be of interest to you as a visitor to this site:

“Cookies” are small text files that may be placed on your Web browser when you visit our Web sites or when you view advertisements we have placed on other Web sites. For more information about cookies, how our Web sites use them, and your options with respect to their use, please see our cookies policy.

WIN Pamoja may make available on this Web site third party applications such as content linking or sharing facilities. Information collected by providers of such applications is governed by their privacy policies.

The site is not currently configured to respond to “do not track” signals or similar mechanisms.

OUR OTHER PRIVACY POLICIES OR NOTICES; CHANGES TO POLICY

This policy provides a general statement of the ways in which WIN Pamoja protects your personal information when you access and use the site. You may, however, in connection with specific products or services offered by WIN Pamoja, be provided with separate privacy policies or notices that describe the privacy practices associated with your use of those products or services. This policy may be changed from time to time to reflect changes in our practices concerning the collection and use of personal information related to your use of the site. If we make material changes to this policy, we will let you know by appropriate means, such as posting the revised copy on this page with a new effective date. The revised policy will be effective immediately upon posting to our Web site. This version of the policy is effective August 15th, 2021.

Privacy Information and Resources

Privacy

WIN Pamoja LLC endeavor to maintain the highest standards of confidentiality and to respect the privacy of our clients and associated persons, our employees, and other individuals whose personal information we collect and process. Our commitment to privacy includes being transparent about the nature and extent of that processing and the rights that may be available to you with respect thereto.

Please note that other, more specific policies may be available to you on sites through which you transact with one of our affiliated companies.

U.S. Policies and Disclosures

Winpamoja.com

You are entitled to access any personal data about you held by WIN Pamoja by sending a written request to the applicable individual identified below. You may be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorized disclosure of your personal information. We will process your request within the time provided by applicable law. You are also entitled to have WIN Pamoja modify or delete any information that you believe is incorrect or out of date.

WIN Pamoja may occasionally contact you by post, telephone, electronic mail, facsimile, etc., with details of products and services that we believe may be of interest to you. If you do not wish to be contacted in this way, if you wish to exercise your rights of correction and access, or if you require further information regarding our privacy policies and practices in the above-referenced regions, please reach out to ask@winpamoja.com.

Our Use of Cookies and Your Options

By using a WIN Pamoja Web site with your browser settings adjusted to accept cookies you consent to our use of cookies and other tools to provide the products and services available on those sites. If you would like to modify your browser to notify you when you receive a new cookie or to disable cookies altogether, please refer to Managing Cookies below.

Cookies and How We Use Them

Cookies are small text files that may be placed on your Web browser when you visit our Web sites or when you view advertisements we have placed on other Web sites. Cookies allow your browser to remember some specific information which the Web server can later retrieve and use. When you quit your browser, some cookies are stored in your computer's memory, while some expire or disappear.

Cookies are used primarily for administrative purposes, to improve your experience with our Web sites. Examples of this would include the use of cookies:

- To improve site security by "authenticating" you (i.e., verify that you are who you say you are) when you sign-in to our site.
- To keep track of your specified preferences such as language, time zone and timeouts after periods of inactivity.
- To allow you to navigate our sites more easily by "remembering" your identity so that you do not have to input your password multiple times as you move between pages or services.

In addition to administrative uses, we may also use cookies in one or more of the following ways, depending on the Web site you are using:

- To conduct research and analytics to improve our Web sites and our products and services. This includes compiling statistical information concerning, among other things, the frequency of your use of our Web sites, the pages visited and the length of each visit.
- To display WIN Pamoja advertisements when you visit Web sites of third parties with whom we have marketing relationships and to help us gauge the effectiveness of our advertising efforts. These parties may gather information concerning your use of other Web sites and provide us with de-identified information about you (such as demographic information or the names of sites where you have been shown ads) which we may use to provide you with more relevant and useful advertising.

This paragraph applies only to the www.winpamoja.com Web site. That site may use third parties to serve advertisements as described immediately above. To do so, these parties may place or recognize a unique cookie on your browser (including through the use of pixel tags) to gather information concerning your use of our that site and other Web sites and, based on that information, serve advertisements that may be of interest to you. If you would like more information about this practice, and to learn how to opt out of it on the particular device on which you are accessing this Privacy and Cookies Policy, please contact ask@winpamoja.com.

For more information on how we collect and use information that is identifiable to you, please contact ask@winpamoja.com.

Managing Cookies

The Help menu on the menu bar of 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 and 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. Some of our sites employ "functionality cookies" that help the site remember your settings and preferences for use when you visit the site in the future. This provides a more tailored and pleasant user experience. These cookies store information in multiple places. On those site using functionality cookies, you will find a "Delete Cookies" feature on every page that will allow you to delete these cookies completely from your device. Please note that, if you decline to use cookies, you may experience reduced functionality and, for sites using authentication-related cookies, declining cookies will prevent you from using the Web site altogether. To learn more about what cookies are set on your computer as you browse the Web and how to manage or delete them, visit www.allaboutcookies.org.