

Candid, Laureate, Yoked

# CANDID LAUREATE AND YOKED TECHNOLOGIES

Trading as CLY Technologies.

# CLIENT DATA PROTECTION POLICY

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Website: clytechnologies.com

At **CLY Technologies**, we believe in the utmost importance of safeguarding your privacy and protecting your data. As part of our unwavering commitment to transparency, security, and compliance, we are pleased to present our robust Data Protection Policy.

Our Commitment to Privacy: At the core of our operations is a dedication to ensuring the confidentiality and integrity of your information. We understand that in today's digital landscape, the protection of sensitive data is paramount. Our Data Protection Policy is designed to instill confidence in our clients, customers, and partners by outlining the measures we take to secure and handle your data responsibly.

# Key Highlights:

# Strict Compliance:

We adhere to all relevant data protection laws and regulations under the Kenyan Law and different countries where our servers are hosted to ensure that your data is processed lawfully, fairly, and transparently.

# Data Collection and Purpose:

We collect only the necessary data for specified and legitimate purposes, and we ensure that your information is not used for any other purposes without your explicit consent.

# Security Measures:

Our state-of-the-art security infrastructure employs industry-best practices to protect your data from unauthorized access, disclosure, alteration, and destruction.

# Data Access Control:

Access to your data is restricted to authorized personnel only, and stringent access controls are in place to ensure that your information is accessed only by those who are authorized and require it for legitimate purposes; even within the **CLY Technologies** confined environment.

#### Data Retention and Disposal:

We retain your data only for as long as necessary for the purposes for which it was collected. Once this period expires, your data is securely and permanently disposed of. Upon disposal, data cannot be recovered.

# Third-Party Partnerships:

In cases where third-party partnerships are involved, we ensure that these entities adhere to the same high standards of data protection that we maintain.

Your Rights: As our valued clients, customers, and partners, you have rights regarding the personal information we hold about you. Our Data Protection Policy outlines these rights and details the processes in place to facilitate the exercise of these rights.

Your trust is of paramount importance to us. If you have any questions or concerns regarding our Data Protection Policy, please do not hesitate to contact us either directly or anonymously.

Thank you for choosing **CLY Technologies**. We are committed to ensuring that your experience with us is not only productive but also secure and trustworthy.

#### 1. Legal Framework.

**CLY Technologies** is domiciled in the Republic of Kenya. It is therefore governed by the laws and regulations of Kenya and by extension the Data Protection Act of 2019.

### 2. Data CLY Technologies collects from you and how we use it.

We do our best to collect only information that is relevant for use with the computer systems we develop and deploy for you. This includes legal names, telephone numbers, email addresses, location, identification numbers, gender, finances, proprietary data, IP Addresses, device info, and inventory information.

Once data has been stored in our systems, we give access only to the following categories of people;

- a) Your Employees: who you have authorized as per their access levels.
- b) CLY Technologies Employees: who are authorized and only as per their access levels. Our employees have Non-Disclosure Agreements that restrict their ability to exploit your data even after their exit from CLY Technologies.
- c) Third Parties: who you have explicitly and in written form allowed to access your data.

We only collect this data when you visit our domains, IP addresses, or apps and only if you allow access.

# 3. Network traffic that may go through third parties.

**CLY Technologies** ensures that all the data transmitted between you and your devices and our servers is SSL encrypted. Third parties cannot see your actual data in as much as they can see you are accessing our servers. Encrypted data is routed through your internet service provider (ISP) to our servers.

# 4. Data disclosure.

We shall only disclose data to a limited user base as outlined in sections 3(a), (b), and (c).

In the case that we are legally obligated to disclose data by Kenyan Authorities, we notify you first and properly guide you on which data we are required to disclose, how we shall disclose it, and why we are required to disclose it. We can only do this when these disclosure requirements are initiated in full compliance with the requirements of Kenyan Law.

Our general policy is to challenge these requests whenever possible and where there are doubts as to the validity of the request or if there is a public interest in doing so. We shall not comply with requests to disclose client data unless all legal remedies have been exhausted.

# 5. Your privacy rights.

You can request **CLY Technologies** to back up or remove data you deem erroneous from our servers so long as such a request is done in writing. Once you serve us with such a notice, we shall be obligated to delete said data in under 24 working hours.

### 6. Modification to this Privacy Policy.

**CLY Technologies** reserves the right to review and change this Privacy Policy at any time. These changes shall always be communicated to you, our esteemed client and your continued use shall be deemed as consent. Any change made shall always conform to your commitment to privacy.