

AMCHAM KENYA PRIVACY POLICY

1. Introduction

Protecting the personal, private, and confidential information of American Chamber of Commerce members and visitors, whether obtained electronically, over the telephone, or through our offices, is a fundamental principle and a fundamental part of how we conduct our business. Our operations are therefore guided by a Privacy Policy that governs the handling of all personal information we collect.

The American Chamber of Commerce Kenya, has created a policy in order to demonstrate and communicate our commitment to protecting the privacy of our members, partners, and potential website visitors. This policy is consistent with the privacy and data protection policy (2018-kenya) enforced by Article 31 of the Constitution and the Data Protection Bill 2018.

The American Chamber of Commerce Kenya reserves the right to change this policy, and it may be updated periodically. These changes may affect how we use your personal information. Please check for changes regularly.

2. Privacy Statement

This policy deals only with personal information handled by The American Chamber of Commerce, Kenya. Personal information identifies a specific individual but excludes business contact information. The following explains how we handle your personal information.

3. Accountability

The American Chamber of Commerce is accountable for all personal information under its control.

The Chamber's privacy officer, who is responsible for the privacy policy, is

Derrick Vikiru

Email: derrick@amcham.co.ke

Any questions about our handling of personal information should be directed to our Privacy Officer. Please see below for more information about the process for referring questions regarding your personal information.

4. Purpose of Personal Information

The purpose for which the American Chamber of Commerce, Kenya collects personal information will be identified at or before the time the information is collected. We may collect personal information for the purposes of:

- Administering Chamber membership and providing member services
- Registering for Chamber events;

AMCHAM KENYA PRIVACY POLICY

- Purchasing various Chamber products or and;
- Processing and administering the above, including contractual arrangements that the American Chamber of Commerce, Kenya has entered into with third parties in pursuance of the above, as strictly necessary.

We will not use personal information for any purpose other than that identified at or before the time of collection.

5. Consent

The American Chamber of Commerce, Kenya, seeks consent for all personal information we collect, use, and/or disclose prior to, or at the time of, collection. If you have voluntarily provided information, you have consented to the collection, use, and/or limited disclosure of your personally identifiable information as described in this privacy policy and in conjunction with the website (amcham.co.ke) Terms of Use. As required by law, we will not use your personal information for any purpose other than that for which you have consented. Should we require personal information for a new purpose, we will contact you to seek consent for that new use.

6. Limits for Collecting, Using, Disclosing, and Keeping Personal Information

The American Chamber of Commerce, Kenya, does not collect, use, or disclose personal information of individuals except when you give consent (explicit or implied) and provide the information on a voluntary basis. There may be occasions where more specific personal information is necessary for us to proceed with a request for information or provide you with a product or service. In such cases, we will provide you with a description of the information we need. In all cases, the American Chamber of Commerce, Kenya, limits the amount and type of information collected to only that which is required to provide you with the requested information, product, or service. We collect only information that is voluntarily provided by you and undertake that such information will be kept strictly confidential.

We retain personal information only as long as necessary to provide you with the requested product, service, or information, and for current and future membership renewals. We then delete or destroy this information as appropriate to do so.

In some cases, note that legal reporting and retention requirements require us to retain information for a specific amount of time. Under these limited circumstances, privacy-protected information will be retained only for the period required by law.

The American Chamber of Commerce, Kenya, will not sell or trade any personal information with third parties. Disclosures of information will be made in circumstances where the Chamber has entered into a contractual arrangement with a third party, and the purpose of that contract is the provision of a product, service, or benefit. In such circumstances, information disclosure will be limited to information strictly necessary for the provision of the contracted benefit or service. The Chamber may transfer information

AMCHAM KENYA PRIVACY POLICY

to service providers where information processing is outsourced in the course of certain administrative or contractual procedures or member services.

Where personal information is transferred to a service provider for processing, we require that provider to respect this Privacy Policy and restrict them from using or disclosing the transferred personal information for any purpose other than the provision of services to us.

Any personal information we store is always kept in a manner that ensures its security and confidentiality.

7. Safeguarding Personal Information

The American Chamber of Commerce, Kenya respects the privacy of our members, partners, website visitors, and internet users, and will protect that privacy as vigorously as possible. We store personal information in secure electronic and physical files.

Our security measures include:

- Secure locks on filing cabinets
- Computer system firewall protection
- Password-protected files
- Virus-protected software

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or receive from us electronically.

This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make every effort to ensure its security on our servers.

8. Data Retention

The American Chamber of Commerce, Kenya, employs security measures to protect your information from unauthorized access and unlawful processing, as well as accidental loss, destruction, and damage. We will retain your information for a reasonable period, or as required by law.

9. Information That We Collect from You

When you visit, register or order products or services on this website you may be asked to provide certain information about yourself including your name, contact details, membership number and credit or debit card information. We may also collect information about the following:

AMCHAM KENYA PRIVACY POLICY

Your usage of our website, as well as information about you from any messages you post to the website, and/or e-mails or letters you send to us.

Information about your visit, including but not limited to your IP Address, operating system, browser version, geographical location, length of your visit, and pages visited. This information is stored in our server logs and used to generate anonymous statistics to help us improve our service to you. We reserve the right to use this information to investigate and act against any misuse of the site.

Information provided by you via online forms. This includes, but is not limited to, inquiries, complaints, and registration forms.

Any transaction you perform on our site. This includes personal information that may identify you for the purposes of the transaction and any account you may hold with us. We may also use this information for anonymous statistical purposes.

10. Use of Your Information

Your information will enable us to provide you with access to appropriate parts of our site and to supply the goods or services you have requested. It will also enable us to bill you and contact you when necessary, regarding your orders. We will also use and analyze the information we collect to administer, support, improve, and develop our business.

We may use your information to contact you for your views on our services and to notify you occasionally about important changes or developments to the site or our services. Further, we might also use your information to let you know about other products and services which we offer that may be of interest to you, and we may contact you by e-mail.

We may also use your information for all or any of the following purposes:

- To generate anonymous statistical reports. These are essential to give us an overview of how our site is being used and enable us to improve our service.
- Personal data submitted to this site may be used for the following, plus any purpose stated on the relevant part of the site:
 - administer the website;
 - improve your browsing experience by personalizing the website;
 - enable your use of the services available on the website;
 - send statements and invoices to you and collect payments from you;
 - send you general commercial communications;
 - send you email notifications, which you have specifically requested;
 - provide third parties with statistical information about our users – without identifying any individual user;
 - deal with inquiries and complaints made by or about you relating to the

website. Any other purpose stated on the relevant part of our website at the point the data is gathered.

11. Disclosure of Your Information

Third parties outside of Kenya may be used to host the website, process information, fulfill and deliver orders, process credit card payments, and provide support services on our behalf. We will only use providers that follow all reasonable safeguards to protect your information.

We may also pass aggregate information on the usage of our site to third parties, but this will not include information that can be used to identify you.

When providing us with your details, we may also allow carefully selected third parties, including other companies in our group, to contact you occasionally about products and services which may be of interest to you. They may contact you by email with your consent.

Finally, if our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.

Countries outside Kenya may or may not always have strong data protection laws. However, we will always take steps to ensure that third parties use your information in accordance with this policy. Unless required to do so by law, we will not otherwise share, sell, or distribute any of the information you provide to us without your consent.

12. Cookies and Password-Protected "Member Only" Services

Cookies are small amounts of information that we store on your computer. Cookies make it easier for you to log on to and use the site during future visits. They also allow us to monitor website traffic and personalize the site's content for you. Cookies cannot damage files, nor can they read information from a user's hard drive. This cookie does not contain any personal information, but it allows our server to identify you as having successfully logged in so that you do not have to re-enter your password each time you access a password-protected page during that session.

You may set up your computer to reject cookies, although, in that case, you may not be able to use certain features on our site. To access password-protected member areas on the American Chamber of Commerce, Kenya website, you must accept a cookie from our Web server.

13. Accessing and Updating

The American Chamber of Commerce, Kenya, makes every effort to keep personal information as accurate, complete, current, and relevant as necessary for the identified purposes. We do not routinely update personal information. Also, on written request, you may view or edit your personal information as collected and currently stored by the American Chamber of Commerce, Kenya. You are entitled to see the information held about you, and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us at info@amcham.co.ke

The Chamber will inform you of what personal information we have, what it is being used for, and, wherever possible, to whom it has been disclosed. There may be exceptional circumstances, as provided by law, under which the Chamber may not be able to give an individual access to the personal information about them held by the Chamber. In such cases, the Chamber will explain the reason for this lack of access. Any requests should be directed to our Privacy Officer. To make a request, please send a personally signed email or letter to our Privacy Officer.

In your letter, please specify the following information: your name, complete contact information, membership number, business or organizational affiliation, and the nature of your request, including whether you wish to edit or simply view the information, or inquire as to its use and/or disclosure. We will reply to your request within 60 days of receipt, or if we are unable to respond within this time, we will send you a notice of extension. If we are unable to disclose all the personal information we hold about you, we will give you a reason for our inability to do so, unless prohibited by law.

14. Questions

Any questions or comments you may have about our handling of personal information should be directed to our Privacy Officer.

15. Changes to Our Privacy Policy

Any changes to our privacy policy in the future will be posted on the site and, where appropriate, sent by e-mail.

