Introduction:

This data privacy statement describes our policies and procedures on the collection, use, disclosure, storage, and protections of your information when you access and use the service and tells you about your privacy rights and how the law protects you. We use your personal data to provide and improve the service.

By accepting this privacy policy, you explicitly consent to the collection, use, processing, and storage of your data as described herein. You acknowledge that your data may be collected for the purposes outlines in this policy and that you have read, understood, and agreed to these terms.

Controller:

ZEP-RE (PTA Reinsurance), a regional reinsurance organization established by an Agreement of the Heads of State and Governments of COMESA dated 21st November 1990, headquartered at 8th floor, ZEP-RE Place, Upper Hill, Longonot Road, P.O. Box 42769-00100 Nairobi, Kenya (hereinafter referred to as "**ZEP-RE"**), who is both data controller and data processor.

What Data is Collected:

Personal data – while using our service, we may ask you to provide some personally identifiable information that can be used to identify or contact you. This information includes, but is not limited to:

- Account Information: Name, email address, username, password, and contact details.
- User Profile: Job title, institution, profile picture, and other optional details.
- **Payment Information** (if applicable): Billing details, transaction history (processed securely via third-party payment processors).

Learning and Usage data – some information related to the technology, device, or infrastructure used may be automatically collected when you interact with our service and this can include but is not limited to:

- Course Activity: Progress, completion status, quiz scores, assignments, and interactions.
- Device & Log Data: IP address, browser type, operating system, access times, and usage patterns.
- Cookies & Tracking Technologies: We use cookies and similar technologies to enhance user experience and analyze trends.

How and Why the Data is Collected

User registration and profile setup – we collect personal data when users register for an account and set up their profiles on our service. This includes information such as name, email address, username, password, and other details required to create and manage the user account. Additional optional information such as profile photo may also be provided by the user to complete their profile. This data is used to authenticate users, personalize their experience, and enable access to the service.

Cookies – the service uses cookies and similar technologies to enhance user experience, improve system performance, and collect technical data. Cookies help us remember user preferences, keep users logged in during sessions, and analyze patterns to improve the service's functionability. Users can manage or disable cookies through their browser settings, however, please note that disabling cookies may affect the functionality and performance of certain features.

Use of your data:

We may use Personal Data for the following purposes:

- 1. To provide and maintain our Service, including monitoring the usage of our Service.
- 2. To manage your Account: to manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to You as a registered user.
- 3. For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the Service.
- 4. To contact you: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- 5. To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- 6. To manage your requests: To attend and manage your requests to Us.
- 7. For business transfers: We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Service users is among the assets transferred.
- 8. For other purposes: We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and evaluating and improving our Service, products, services, marketing and your experience.

Sharing your data

We may have to share your personal information in the following situations:

1. To third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

- We require all third parties to respect the security of your personal data, process your personal data for specified purposes and to treat in accordance with our instructions.
- 2. We may share your information with our affiliates; in which case we will require those affiliates to honour this data privacy statement. Affiliates include our parent company, and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- 3. We may disclose your personal information for any other purpose with your consent.
- 4. ZEP-RE may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities. We may also disclose your personal data in the good faith belief that such action is necessary to comply with a legal obligation, protect and defend the rights or property of ZEP-RE, prevent or investigate possible wrongdoing in connection with the service, or protect the personal safety of users of the service or the public against legal liability.

We never disclose any of your personal information or other details, while sharing your data with third parties. We do it according to the laws and regulations. Only our admins have access to your data if you have used any of the methods that we use to collect it. Your data with us cannot be accessed by anyone else. However, you are always free to examine and remove your data.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Subject Rights

You, as a data subject, have the right to:

- (a) be informed of the use to which your personal data is to be put;
- (b) access your personal data in custody of data controller or data processor;
- (c) object to the processing of all or part of your personal data;
- (d) correction of false or misleading data; and
- (e) deletion of false or misleading data about you.

Data Transfer

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to, and maintained on computers located outside of your state,

province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Data Retention

We will use your personal data only as long as it is necessary to implement, administrate, or manage your access to our service or as required to comply with applicable legal or regulatory obligations. When we no longer need your personal data, which will generally be seven (7) years after the data has been provided, we will remove it from our systems. If we keep the data any longer, it would be to satisfy legal or regulatory obligations.

Changes

We may update our privacy statement from time to time. We will notify you of any changes by posting the new privacy statement on this page and letting you know via email and/or a prominent notice on our service, prior to the change becoming effective and updating the date at the top of this privacy policy.

You are advised to review this privacy policy periodically for any changes. Your continued use of our services will only be permitted once you have opted in to the revised policy.

Contact Us

If you have any questions about this privacy statement, you can contact us:

By visiting this page on our website: https://zep-re.com/contact/