



PRIVACY POLICY

Last updated: August 25, 2023

INTRODUCTION

This Privacy Policy is designed to help you understand how Siginon Group and its related subsidiaries and affiliates, including Siginon Global Logistics (Nairobi and Mombasa) SPC Properties, Star Rentals Limited, KENPLUS, TAI+ ("Siginon group," "we," "us" or "our") collects, uses and shares personal information collected through this website. We value your privacy, and we will not share your personal information with third parties except as described in this Privacy Policy without your consent. BY USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS OF THE PRIVACY POLICY, PLEASE DO NOT USE THIS WEBSITE OR PROVIDE US WITH YOUR INFORMATION.

What this Privacy Policy Covers

This Privacy Policy describes our Policies and Procedures on the collection, use and sharing of your personal information (a) when you visit our website at <https://www.siginon.com> and its related sites, including <https://www.spcproperties.co.ke>, <https://www.kencont.com>, <https://www.kenplus.ke>, <https://www.tai-plus.com> (the "Site"), (b) receive our communications or participate in our online or offline activities or events, (c) fill out an application on our website, and (d) that we obtain from third parties such as resellers, database vendors, content publishers and suppliers. This Privacy Policy applies only to information gathered on and through the Site and does not apply to any other information or websites not owned or operated by Siginon group or information collected by Siginon group by other means.

Personal Information We Collect

1. **Information You Give Us.** Personal information you may provide through the Site or otherwise communicate to us includes:
 - a. **Contact information.** We collect information about you when you provide contact information to us via email, mail, or through the Site, including because of

providing your contact information to us or requesting for a quote from us via the website. This information may include your first and last name, email address, mailing address, phone number, and credit card information.

- b. **Feedback and correspondence.** We may collect information about you when you request information, respond to surveys, or otherwise correspond with us.
 - c. **Other information.** We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Privacy Policy.
2. **Information We Get from Others.** We may obtain additional information about you from third party sources, such as service providers, vendors, social media sites, and advertising agencies to provide you with relevant information about our services.
 3. **Information Automatically Collected.** Our servers and third party service providers may automatically record certain information about how you use the Site, such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy below for more information.
 4. **Statistical Analyses.** We use Google Analytics to help us gather statistical information about the visitors to our Site and how they use the Site on an anonymous, aggregate basis. However, we will not associate this data with your personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental requests or to comply with law. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services. Depending on the type of browser and device that you use, you may have the ability to control the type of information that Google Analytics uses. To understand how Google Analytics collects and processes data, please visit www.google.com/policies/privacy/partners/. We reserve the right to license or sell aggregate, de-identified information about the visitors to our Site, but this information will not contain your personal information or otherwise be individually identifiable.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described to you in this Privacy Policy or at the time of collection:

1. **To Provide the Site and Communicate with You.** We use your personal information:
 - a. to provide, maintain and improve the Site;
 - b. to better understand your needs and interests, and personalize your experience with the Site;
 - c. to process applications for admission that you submit through the Site;
 - d. to respond to your requests, questions, comments, and feedback; and
 - e. to perform website analytics and database management services.



2. **To Send You Communications.** We may send you newsletters or other communications, but you may opt out of receiving them as described in the Your Choices section below. Your information may be used both while you are a current student at Signon group and after you have graduated from Signon group.
3. **To Advertise to You.** We may use your personal information to manage and serve ads in the Site or on third party sites and to tailor ads to your interests and browsing history. In addition to the cookies utilized by us on this Site, Signon group may allow trusted third parties to place advertisements for our services on sites and applications operated by others. These third parties may use cookies and web beacons to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests both on our Site and other sites and applications that you may visit (see our Cookie Policy below). To support this interest-based advertising solution, we, and the companies we have contracted with may use anonymous information about your visits to our and other websites and applications. The information collected and used by this process is always anonymous and does not enable any third party to identify you individually. You can learn more about interest-based advertising and opt out of such advertising from certain companies at aboutads.info.
4. **For Compliance, Fraud Prevention and Safety.** We may use your personal information as we believe appropriate to:
 - a. investigate or prevent violation of the law or your agreements with us;
 - b. protect our, your or others' rights, privacy, safety, or property (including by prosecuting and defending legal claims);
 - c. protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity;
 - d. comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities; and
 - e. where permitted by law in connection with a legal investigation. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons.
5. **With Your Consent.** In some cases, we may ask for your consent to collect, use, or share your personal information.

How We Share your Personal Information

We may use third parties to help us design and operate the Site, provide services to support the Site, process your information, and provide promotional and marketing activities on our behalf. For example, we may hire a company to run certain website applications, help us analyse our data, process your credit card information, or send information on our behalf about services and events in which you may be interested. Unless otherwise indicated at the time we collect your information, if we allow third parties to access the personal information



we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Privacy Policy.

We do not share your personal information with third parties without your consent, except in the following circumstances:

1. **Signon Group - Related and Affiliated Organizations.** We may share your personal information with Signon Group's affiliates and related organizations, such as Signon Group's alumni organization, for use consistent with this Privacy Policy.
2. **Service Providers.** We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities and to promote our services to you. A list of our current service providers is available upon request.
3. **Business Partners.** We may share your personal information with our business partners who offer a service to you jointly with us. A list of our current business partners that have access to certain personal information we collect is available upon request.
4. **Security, Compliance, Fraud Prevention, Safety; Compliance with Law.** We may disclose your personal information as we believe appropriate to government or law enforcement officials or private parties for the purposes described above under the following sections: For compliance, fraud prevention and safety and for compliance with law.
5. **Business Transfers.** We may sell, transfer, or otherwise share some or all our business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

Your Choices

1. **Opt-Out of Marketing Communications.** You may opt out of marketing-related emails by changing the communication preferences in your account settings or by following the opt-out prompt in the email. To opt out of other forms of marketing communications, please contact us using the contact information provided at the end of this Policy.
2. **Consequences of Not Providing Personal Information.** You are not required to provide all personal information identified in this Privacy Policy to use our Site or to interact with us offline, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.



Cookie Policy

1. **What are Cookies?** Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies set by the website are called “first party cookies.” Cookies set by parties other than the website are called “third party cookies.” Third party cookies enable third party features or functionality, such as advertising or website analytics, to be provided on or through the website. The parties that set these third-party cookies can recognize your computer or device both when it visits the in question and when it visits certain other websites and/or mobile apps.
2. **What Cookies and Other Tracking Technologies does Siginon Group Use?** We use several different kinds of cookies on this Site, including:
 - a. Necessary cookies: these are cookies that are necessary for the Site to function and cannot be switched off in our systems;
 - b. Functional cookies: these enable the Site to provide enhanced functionality and personalization like sharing the content of the website on social media platforms, collect feedback; and other third-party features;
 - c. Performance cookies: these are used to understand and analyse the key performance indexes of the website with helps in delivering a better user experience for visitors;
 - d. Analytics cookies: these are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.
 - e. Advertisement cookies: these are used to provide visitors with relevant ads and marketing campaigns. These cookies track visitors across websites and collect information to provide customised ads.
 - f. Others: there may be other uncategorised cookies that are being analysed and have not been classified into a category as yet.

We use cookies to improve your experience while you navigate through our sites. Out of these, the cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the sites.

In addition to our own cookies, we collaborate with various third-party service providers who also use cookies to help us optimize our website and understand more about the visitors to our website. For example, we may use analytics providers like Google Analytics to provide us with demographic information about our visitors and to help us analyse how people use our website. These cookies are stored in your browser only with your consent. You have the option to opt-out of these cookies. But opting out of some of these cookies may affect our browsing experience. For instance, you may not be able to store your preferences, and some of our pages might not display properly.

3. **Cookies are not the only way to track visitors to a website.** We may use similar technologies from time to time, like web beacons (sometimes called “tracking pixels”



or “clear gifs”). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Sites. These technologies often depend on cookies to function properly, and so disabling cookies may impair their functioning. In addition, if you sign up to receive our e-mails, we will also use cookies in conjunction with these emails. When your browser downloads any graphic content in the e-mail, we will also place a cookie on your computer that will tell us if you come to our website later.

4. **How Can You Disable Cookies and Other Tracking Technology?** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them the information is provided within the website.

Other Important Privacy Information

1. **Third Party Sites and Services.** The Site may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications, or services, and we are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more.
2. **Security.** The security of your personal information is important to us. We take several organizational, technical, and physical measures that are designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the absolute security of your personal information.
3. **International Data Use.** We are in the Kenya and have affiliates and service providers in other countries, and your personal information may be collected, used, and stored in the Kenya or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country.
4. **Children.** The Site is not intended for use by anyone under the age of 18, nor do we knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, you should not attempt to use the Site or send any information about yourself to us.
5. **Changes to this Privacy Policy.** We reserve the right to modify this Privacy Policy at any time. If we make changes to this Privacy Policy, we will post them on the Site and indicate the effective date of the change. If we make material changes to this Privacy Policy, we will notify you by email or through the Site.



6. **Your Rights.** The Data Protection Act give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:
 - a. **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
 - b. **Correct.** Update or correct inaccuracies in your personal information.
 - c. **Delete.** Delete your personal information.
 - d. **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
 - e. **Restrict.** Restrict the processing of your personal information.
 - f. **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

How to Contact Us:

We have appointed a data protection officer (DPO) to oversee compliance with this Privacy Policy. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO on dpo@siginon.com.





Web Site and Services Disclaimer and Limitation of Liability

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While Siginon Group makes every effort to ensure that the information contained on its website is accurate, up-to-date and relevant, this information as well as any documents ordered or received via any of our services are subject to change and may be incomplete, no longer current at a particular point in time or inaccurate due to human error. We disclaim all liability for these errors or omissions.

Further, the information obtained on our website as well as any documents ordered or received via any of our services is provided on an "as is" basis and we make no representations or warranties of any kind with respect to the information. We disclaim all such representations and warranties, including warranties of merchantability and fitness for a particular purpose.

Siginon Group, its employees, or other representatives will not be liable for damages arising out of or in connection with the use of information stored or obtained from our website. This is a comprehensive limitation of liability that applies to all damages of any kind, including (without limitation) compensatory, direct, indirect, or consequential damages, loss of data, income, or profit, loss of or damage to property, and claims of third parties.





Web Site Terms of Use

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General

By using Siginton Group's web pages, users agree to abide by the conditions specified in this disclaimer notice and/or their contract(s) with us.

Communications via Web Site

All messages received or sent by us and any continuing electronic mail messages are our property. We shall not be required to answer in a timely fashion or at all any message or other communication received via our website.

Deep Linking

Web sites may NOT link to any portion of our web pages without prior written consent from us.

Jurisdiction

By using the our web pages or any of our online services, the user agrees to the jurisdiction of the courts of Kenya, and to the application of the Laws of Kenya.

External Links

Siginton Group Ltd is not associated with, nor does it endorse, any external sites to which it links except as explicitly noted within our website.

Trademarks

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