

Applicable Date: May 25, 2018

SCOPE

NSINGO & COMPANY LTD

DATA PRIVACY POLICY

This Data Privacy Policy ("Privacy Policy") applies to all Nsingo & Company Ltd ("Nsingo") associates, vendors, contractors, and other third parties who have access to Nsingo & Company Ltd systems or information ("Users"). It also applies to all content distributed and created under the imprint "Nsingo Sakala". The reference to Nsingo & Company Ltd will include any Nsingo & Company Ltd entity now in existence or hereafter created or acquired including, without limitation, Nsingo Sakala, Nsingo, nsingo.com, nsingosakala.com.

Each User will comply with this Privacy Policy at all times.
From time to time, this policy may be updated by Nsingo & Company Ltd associates.

PURPOSE

This Privacy Policy is intended to provide Users with the privacy principles under which Nsingo & Company Ltd Processes personal information which may be received from the United Kingdom, countries belonging to the European Union ("EU"), United States of America, and/or other countries.

Any questions should be directed to Nsingo & Company Ltd's privacy team at info@nsingosakala.com.

Definitions

Personal Data - Personal Data is data about a living individual that can be used to identify, directly or indirectly, the identity of the user. Personal data could be a name, an identification number, location data, a photograph, or any online identifier attached to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Usage Data - Usage Data is data we collect automatically based on your use of Nsingo & Company Ltd.

Cookies - Cookies are small pieces of data stored on a user's web browser or device. Nsingo & Company Ltd uses Cookies to streamline your login and enable greater customization and personalization of our service.

Data Controller - Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which your personal data is, or is to be, processed. For the purpose of this privacy policy, Nsingo & Company Ltd acts as a Data Controller.

Data Processor - Data Processor (or Service Provider) means any person (other than an employee of Nsingo & Company Ltd) who processes the data on behalf of the Data Controller. For the purpose of this privacy policy, Nsingo & Company Ltd also acts as a Data Processor. Additionally, we may use the services of various Service Providers in order to process your data more effectively.

Data Subject - Data Subject is any living individual who is the subject of Personal Data.

User - The User is the individual using Nsingo & Company Ltd. The User corresponds to the Data Subject, who is the subject of Personal Data.

"Applicable Laws" - (a) UK Data Protection Act 1998 and the GDPR; and (b) any other Data Protection Laws, to the extent such laws are applicable to Nsingo & Company Ltd.

"Associate Personal Data" - the Personal Data. of a Nsingo & Company Ltd employee.

"Data Protection Laws" - the data protection or privacy laws of any country, state or other locale.

"GDPR" - EU General Data Protection Regulation 2016/679 as enacted into English law.

"Personally Identifiable Information" ("PII") means any information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

Further, PII is defined as:

(1) Information that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.), in conjunction with other data elements which may allow indirect identification of an individual (e.g., a combination of gender, race, birth date, geographic indicator, and other descriptors);

(2) Information permitting the physical or online contacting of a specific individual; and

(3) Information containing Sensitive Data. PII can be maintained in paper, electronic or other media.

"Personal Data" will collectively refer to PII, Personal Information and/or Sensitive Data.

"Personal Information" means any information relating to an identified or identifiable living person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

"Process" (including "Processes", "Processing" and "Processed") of Personal Data means any operation or set of operations which is performed upon Personal Data, whether or not by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure or dissemination, and erasure or destruction.

"Sensitive Data" is data that pertains to racial or ethnic origins, political or religious beliefs, or health or sex life.

POLICY

In Processing Personal Data, Users will comply with the following general principles.

Notice

Users will ensure a privacy notice is accessible to all Data Subjects, which will contain the purposes for which Personal Data is collected and used by Nsingo & Company Ltd, in accordance with Applicable Laws. In certain situations, data is collected, Processed, stored and transported in an anonymous format. In that case, PII and Personal Data is not contained within the data, Data Subjects are not known by the data processors within Nsingo & Company Ltd and no notice is required. Any complaints or inquiries pertaining to Nsingo & Company's collection, use, storage, or Processing of Personal Data should be directed to info@nsingosakala.com.

Choice

Where appropriate, Nsingo & Company Ltd will provide each Data Subject the opportunity to opt out from allowing Nsingo & Company Ltd to disclose his/her Personal Data to a third party or to use it for a purpose incompatible with the purpose for which it was originally collected or authorized. For Sensitive Data, affirmative choice (opt-in) must be given if the data is to be disclosed to a third party or used for a purpose other than its original purpose or the purpose authorized.

Accountability for Onward Transfer (to Third Parties)

Nsingo & Company Ltd aims not to pass on any information to third parties or to engage in any third party transactions involving your data. Should there be any need to involve a third party in the use of your data we shall inform you either by email or in writing by post of that intent before taking any action.

Nsingo & Company Ltd is not in the business of selling personal information to third parties. Instead, we're in the business of helping investors and traders find and purchase products they'll enjoy & find useful.

We do not sell personal data to third parties. This also means we never sell or rent out the email contact information for Nsingo & Company Ltd users.

If a third party claims to know you and requests your contact information, we will not share your contact information. In these cases, we may forward the inquiry to you privately and leave it to you to respond.

Nsingo & Company Ltd, like many businesses, will collaborate with other companies to perform certain business-related functions. Examples of such functions include data services that host our website or data files; certified public accountants which help us manage tax reporting and compliance, or the customer service software company that hosts our customer service platform. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

Security

Nsingo & Company Ltd takes reasonable precautions to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. These precautions include password protections for online information systems and restricted access to Personal Data Processed by the Internal staff. In fact in the majority of cases no more than 2 staff members will have legal access to our user database.

Information Collected on WebSites

For all visitors to the Nsingo & Company Ltd websites, we automatically collect aggregated and anonymized data such as browser type, page views, clickstream, and usage. We use Google Analytics for this data tracking service. Because this information is aggregated and anonymized, it's not visible to the general public. It's only visible to key Nsingo & Company Ltd employees and is used to help us optimize the performance and usability of the site.

In addition to the anonymized analytics collected above, we may also work with similar services to monitor purchase transactions and detect fraud.

We also track IP addresses, account logins, advert views; and products viewed, sampled and purchased.

For book merchandising and promotion purposes, we leverage anonymous aggregated sales data to make automated recommendations and display content that matches user interests. We may also use your browsing or purchase history to improve your product discovery experience by recommending products similar to those you've purchased or enjoyed in the past.

Personal Data Inquires

Nsingo & Company Ltd may disclose personal data if required to do so by law or in the good faith belief that such an action is necessary to

- (i) comply with a legal obligation,
- (ii) protect and defend the rights or property of Nsingo & Company Ltd and our users,
- (iii) act in urgent circumstances to protect the personal safety of users of our service or others (such as if we receive a threat to harm oneself or others),
- (iv) protect against legal liability,
- (v) or we're compelled to do so to protect our users and partners against fraud. If the request is from a government agency.

External Links & Partner Retailers

At our websites we link to a lot of other websites. For example, to other useful material or content on archive.org or another investment website, blog, Facebook or Twitter. The Nsingo & Company Ltd Privacy Policy applies only to Nsingo & Company Ltd and its associated parties listed above, not to these third-party destinations.

Further more Nsingo & Company Ltd works with numerous retail partners and each retail partner contains its own privacy policy. Please refer to the privacy policy of the retailer from which you purchase your Nsingo & Company Ltd product.

Children

Nsingo & Company Ltd does not collect Personal Data from Data Subjects who are deemed incapable to understand investment activities and or research. In the event that a child less than 18 years of age is registered with us, we require that child to provide details of a parent who consents to that child researching investments utilising our services.

Sensitive Data

Sensitive Data may not be Processed at all. It is Nsingo & Company Ltd's policy and practice not to collect or store Sensitive Data from a user. A user may volunteer sensitive data to Nsingo & Company Ltd if they so wish to. But in most cases it will be ignored and deleted upon receipt.

Data Integrity and Purpose Limitation

Each User is expected to take reasonable steps to ensure that Personal Data within Nsingo & Company Ltd systems is accurate, complete, and current. Where appropriate, the Data Subject may have access to review their information.

The Personal Data collected from Data Subjects is limited to the information that is relevant for the purposes of Processing orders and user account and Nsingo & Company Ltd will adhere to these principles for as long as it retains such information.

Questions related to Personal Data

If you have any questions about this policy, the use of Personal Data, or your Personal Data you should contact a member of the privacy team at info@nsingosakala.com or your local Nsingo Sales representative.