

Privacy Statement

Market Masters Limited as well as their associated companies, branches, representative offices and other affiliated or related companies from time to time (collectively “**our Group**”, “**we**” or “**us**”) are committed to protecting your personal data privacy in accordance with the Data Protection Act of Kenya, 2019, Data Protection Regulations, 2021 and General Data Protection Regulations (GDPR).

We shall ensure strict compliance by our staff of this Privacy Statement. Please read the following carefully to understand our policy on personal data privacy protection.

1. Collection of Personal Data

In the course of using our services, you may be asked to provide us with your personal data (which include but are not limited to your name and contact details). All personal data collected by us through our website or through any other medium are to be provided voluntarily by you and you are not obliged to supply the personal data, however if you do not provide your personal data (whether compulsory or optional) we may not be able to provide the relevant services to you. We may also generate and compile information about you. Personal information and particulars provided by you and all information gathered and compiled by us about you from time to time is collectively referred to as “**Personal Data**”.

2. Purposes of Collecting Personal Data

The purposes for which your Personal Data may be used are as follows:

- a. to send you marketing materials and promote services and products to you with your consent;
- b. to supply you with products and services, including reservation services and online services via our websites or any other medium relating to our portfolios of properties;
- c. to verify your identity in connection with any of the services, products and/or facilities that we may supply to you including payment for those services and products;
- d. to communicate with you by email, phone or other means, including contacting you regarding redemption of shopping/dining privileges or offers and responding to your enquiries;
- e. to conduct research to better understand your shopping, dining and spending preferences, interests, experiences and/or habits, including for the purpose of designing new and/or enhancing existing services, products and activities;
- f. to operate and administer any membership clubs, loyalty programmes and reward programmes;
- g. to make disclosure when required by law, regulation, or court order of any jurisdiction, and/or as requested by any government, regulatory or law enforcement authority or administrative organisation, which may be within or outside the Republic of Kenya;
- h. to establish legal claims or defences, obtain legal advice, and/or exercise, defend and/or protect the rights or properties of any member of our Group, including identifying, contacting or bringing legal action against any person who may be causing

interference with such rights or properties (whether intentionally or otherwise) or where any other person could be harmed or property of any other person could be damaged by such interfering activities;

- i. any other incidental or associated purposes relating to the above, or any other purpose to which you may from time to time agree.

3. Disclosure and Transfer of Personal Data

Personal Data held by us will be kept confidential but we may provide or transfer the Personal Data for the purposes mentioned above to:

- a. any member of our Group;
- b. any agent, contractor or third party who provides administrative, marketing and research, data processing, telemarketing, telecommunications, payment, computer or other services to us and/or our Group and who has a duty of confidentiality to the same;
- c. any person to whom our Group is under an obligation to make disclosure under the requirements of any law binding on our Group or for the purposes of any guidelines issued by regulatory or other authorities with which our Group is expected to comply; and
- d. any person under a duty of confidentiality to us (including our accountants, legal advisors or other professional advisors).

We may transfer your Personal Data to the above parties outside the Republic of Kenya if need be for the purposes mentioned above.

4. Retention of Personal Data

We will keep your Personal Data for as long as necessary to fulfil the purpose for which the Personal Data was collected. Personal Data which is no longer required will be destroyed.

5. Security of Personal Data

We will take appropriate measures to ensure that your Personal Data is properly protected. However, there is no security guarantee for any data transmission over the internet and you transmit all such data at your own risk. Once we receive your transmission, only our authorized employees or contractors will be able to access your Personal Data.

6. Links

Links on the website may link to websites maintained by other third parties. These third parties may have their own privacy policies and practices which might not be bound by this Privacy Statement. We make no representation or warranty regarding the accuracy, timeliness, suitability or any other aspect of the information and content on such websites. Access to and use of such other websites is at your own risk and subject to the terms and conditions applicable to such websites.

7. Cookies

When you visit our website, we shall make a record of your visit only for preparing general statistics on the usage of the website to improve the effectiveness of our marketing and promotional activities. Unless we specifically indicate to you that we intend to collect your Personal Data and require you to check a box to agree to such collection, we do not collect any Personal Data from you during your browsing of the website.

We shall also place a cookie in your browser. A cookie is a small file which contains anonymous information about your preferences and navigation pattern in particular sites, including your IP (internet protocol) address, browser type and the city-level location of your internet service provider, thus enabling us to provide more useful features for our users. The data collected by means of “cookies” will not be disclosed to any third parties except to any member within our Group or the agents of our Group, will not be combined with any other information, and will only be used to provide troubleshooting services.

If you wish to disable the cookies, you may do so by changing the setting of your browser. However, in that event, you may not be able to make full use of our website.

8. Access to and Correction of Personal Data

Pursuant to the GDPR and Data Protection Regulations, you have the right to request access to and correction of your Personal Data held by us. Such enquiries or requests should be addressed to:

Email: pr@villagemarket-kenya.com

Miscellaneous

We reserve the right to review, edit, vary or change this Privacy Statement at our sole discretion and without prior notice. If any amended version of the Privacy Statement results in any changes to the way we handle your Personal Data that require your consent, we will bring the amended Privacy Statement to your attention.