PRIVACY POLICY

Thank you for choosing us SIGMA-EDU HOLDINGS LTD. ("Company," "we," "us," or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices regarding your personal information, please contact us at <u>hello@edu-sigma.org</u>.

This Privacy Policy describes how we collect, use, share, and otherwise process personal data of you to our website https://edu-sigma.org ("Site).

1. INFORMATION WE COLLECT AND RECEIVE

Information we collect about you

Like most websites, this Site uses cookies and web beacons.

You do not have to give us information in order to use our Site. However, non-identifiable personal information about visitors to the Site is automatically collected by cookies and web beacons.

This includes technical information about your browser and operating system and actions you take on the Site.

We use this information to understand how visitors use our Site, make your experience of our Site better and assist in our marketing efforts.

If used alone, cookies and web beacons do not personally identify you.

Information you provide

You may provide us with your personal data:

When you communicate with us via this Site, including filling out forms on this website (submitting enquiries, questions, comments, feedback, or contact requests) and by contacting us by email or phone;

When you subscribe to our marketing communications, which includes information about our services and products, events, offers, news, promotions and surveys; When you become our customer, including buying our products.

To fill out forms on this Site, most commonly we ask you to provide your Name, Email, and Phone number. When you contact us via this Site, in emails, phone calls, or other means of communication, at your discretion and where possible you may also provide us with other personal data by putting it in the textbox of enquiry or attaching a file.

2. HOW DO WE USE YOUR INFORMATION?

We use personal information collected via our Site for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a

contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

To facilitate account creation and logon process.

Request feedback. We may use your information to request feedback and to contact you about your use of our Site.

To send administrative information to you. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

To protect our Site. We may use your information as part of our efforts to keep our Site safe and secure (for example, for fraud monitoring and prevention).

To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.

To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Site.

To send you marketing and promotional communications. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We may process or share your data that we hold based on the following legal basis:

Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.

Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

4. HOW WE SHARE AND DISCLOSE INFORMATION?

Under no circumstances we sell, rent, or trade your personal information with any third parties.

We do not share your information without your consent, except for cases that are described below. We may share your personal data with selected third parties:

- Group of companies with the purpose to maintain and provide our services and products, and to maintain and improve this Site.
- Business partners, suppliers and subcontractors for the performance of any agreement we enter into with you or we are about to enter into to provide the best service to you;
- Analytics services and search engine providers that assist us in the improvement and optimization of our Site and services;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others (subject to the relevant consent to receive marketing communications).

We may share personal data when it's required by mandatory legal obligations and to comply with any subpoena, court order and ongoing or prospective legal proceedings, or other governmental request. We may also share personal data to establish or protect our legal rights, property, or safety (e.g, for the purposes of fraud prevention and reducing credit risk).

We may also share anonymous statistics or other information that does not identify individuals personally.

We require all third parties to respect the security of personal data and to treat it in accordance with the legal requirements and in accordance with our instructions. In any way third-parties are not authorized to use your personal data for their own purposes and are only permitted to process your personal data for specified purposes which it was initially collected for.

5. IS YOUR INFORMATION TRANSMITTED INTERNATIONALLY?

If you are accessing our Site from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose

in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Site is at your own risk. You should only access the services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at hello@edu-sigma.org.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

10. DO WE MAKE UPDATES TO THIS NOTICE?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

Company:

SIGMA-EDU HOLDINGS LTD. Limuru Rd/1st Parklands Ave: 1 Park Avenue, 3rd Floor, 1st Parklands Avenue, off Limuru Rd.