### **Privacy Policy**

Shule Africa is responsible for processing your personal data collected through the use of the Shule Africa Website platform.

The platform collects, stores and uses your data to offer its services. Any data that can be directly or indirectly linked to your person is treated as personal data. This data privacy policy outlines how Shule Africa uses your personal data.

Data processing is the responsibility of Shule Africa.

#### **Data Protection Officer & Policy**

January 2021

Shule Africa is responsible for processing your personal data collected through the use of the website and company social media platforms.

The Shule Africa platform collects, stores and uses your data to offer its services. Any data that can be directly or indirectly linked to your person is treated as personal data. This data privacy policy outlines how Shule Africa uses your personal data.

Data processing is the responsibility of Shule Africa.

#### Address:

Nairobi Garage, Cove Court, Watermark Business Park,

Ndege Road, Karen Nairobi Kenya

#### **Contact:**

hello@shuleafrica.com

#### **Introduction and Definition**

Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

Personal data is a major concern and demands special protection. Hence, we are disclosing the type of data that we collect and how we are using this data.

# Purpose of data processing and legislative basis

#### Registration

We start collecting and processing your personal data once you sign up for the atingi platform. We require a set of personal data to offer the services of atingi. This set includes your name, your gender, your email address, your language preferences and your country. To optimize our learning offering, we also ask you for your highest level of education and your employment status.

This set of personal data is required to offer you the learning services of Shule Africa. We will also use your contact details to send you information about Shule Africa, learning opportunities, new courses and information about programs and offers from cooperation partners. We do this so that you can use Shule Africa as effectively as possible. If you no longer wish to receive information, you can simply inform us via hello@shuleafrica.com.

In addition, you can upload a profile picture. We will publish your picture only if you give us the consent. You can withdraw your consent at any time without providing a reason.

You can declare a name during registration. You do not need to use your real name if you do not wish to but you are required to provide a name that will be linked to your account.

#### Learning with Shule Africa.

While using Shule Africa, we will collect and analyse data about your learning progress, your course history, your assessments and your certificates and badges. We cannot offer the services of Shule Africa without this set of data.

You can post messages in a forum and give feedback and ratings to courses. Additionally, you can send and receive messages from other learners and tutors. Should you use these services, the platform will store the communications as part of your record.

If you require support, we will also store your support requests if you choose to contact us.

#### Usage data

While using Shule Africa, we also collect additional data that we analyse anonymously. Anonymous data cannot be tracked down to the individual user. With anonymous data it is impossible to identify an individual user. We analyse anonymous data to improve the usability of our service, e.g. by analysing the device data or the operating system. We use other data, such as page views, to optimise our course offering. You can find the list with all data we collect **here**.

#### Cookies

Cookies are small text files. Cookies are stored on the device of a user when a certain web page is visited. Cookies allow the unique identification of a browser upon repeated visits to a web page.

We use cookies for the log-in to the atingi platform. Certain elements of our website require the unique identification of a browser across various web pages. If cookies are disabled, the log-in to the platform might not work. Other functions of the platform might also not work to the full extent. Additionally, we use cookies to optimise the usability of the platform. We use Matamo as our web tracking software solution. Matamo is open source and uses cookies to track the following data for each session

- device,
- operating system,
- technical settings of the browser,
- anonymous IP-address,
- date and time,
- viewed page or file name.

#### **Challenges and Cooperations / Partners**

When you use Shule Africa, you have the opportunity to participate in competitions and other offers from us and our partner institutions. This includes the cooperation offered with our partners. The participation is voluntary. If you take part in such an offer, Shule Africa will store the personal data you provided during registration. This means that your name, age, gender, the country from which you are participating, your e-mail address and the date of registration will be stored in order to provide documentation that you are participating in the program. The legal basis for this data processing is the Terms of Use. The data will only be stored as long as we need it for documentation purposes. After that time, the data will not be stored for these purposes. We will not pass on this data to third parties. Possible personal data collected by partner institutions will be clearly indicated in the corresponding data protection regulations of the partner institution.

Cooperation with MASTERCARD FOUNDATION

If you participate in a program or challenge where UNICEF also cooperates with Shule Africa, it may be necessary to transfer data to MASTERCARD FOUNDATION. This data is only aggregated data without personal reference or anonymized data. This means that data on the participants is only sent in such a large quantity and without names or other identification features that no reference to persons can be established.

In order to award the winners and outstanding participants of such a competition, the names of these users will only be passed on to MASTERCARD FOUNDATION if you have consented to this transfer of data. This consent is voluntary and can also be denied. Consent can be withdrawn at any time without giving reasons. However, if you revoke your consent to the transfer of data at a later date, it is possible that you will no longer be able to participate in the offer, as we will then no longer be able to make your data available to MASTERCARD FOUNDATION.

#### **Retraction of consent for data processing**

You can retract your consent to our processing of your personal data at any time. If you wish to retract your consent, simply send us an email to hello@shuleafrica.com with your name and date of birth. You do not have to state a reason for your retraction.

### Data transfer and guarantee

Team admins and tutors have restricted access to your personal data. They can access data that is required for the implementation of the course that they manage.

We do not transmit your personal data to any third party. As of now, we do not plan to transmit any of your personal data to a country outside the African continent.

### Storage time

We store your data just for the time period that we require to offer you the services of the Shule Africa platform. If you cancel your access at Shule Africa, we keep your data for an additional 13 months unless there is a diverging legislation. As an exception, certificates acquired through Shule Africa will be kept for years. After this period, your personal data will be automatically purged from our systems unless legislation requires us to keep your data for a diverging period.

### Affected rights

You can request an overview of all data that we have collected from you at any time. You can also ask how we use your data. If your data should be incorrect, you can request a correction of your

data. If you cancel your account at atingi, you can also request the immediate deletion of your personal data from our system. You can also object to the processing of your personal data if you do not use your data anymore.

During the processing of your request for transparency, revocation or deletion you can request the restriction of your data processing. In this case, we store your data for the purpose of processing your request.

You can contact our data protection officer if you have questions concerning your data or the data protection policy of the Shule Africa platform. You can reach the data protection officer at: hello@shuleafrica.com

## Right of appeal

Please contact our data protection officer if you have any complaint or question. Furthermore, you can log a complaint at the respective data protection inspectorate. The applicable data protection inspectorate is the <u>Data Commissioner(centre) Kenya</u>.