poa! Privacy Policy

Your privacy is important to Poa Internet Kenya Limited (hereinafter "**Poa**"). This privacy policy (the "Policy") applies to use of the poa! service (the "Service"). This Privacy policy also applies to the use of the poa! world wide website (www.poa.co.ke) and the poa! portal (a web site accessible via the Service) (collectively the "Web Site"). This Policy is intended to inform you about how information, including personal information, is collected, used and disclosed while visiting the Web Site or using the Service and explains how Poa protects and stores such information.

By using the Web Site or the Service you agree to the terms of this Policy and you expressly consent to the processing of Information and Session Data according to the terms contained herein. Your only remedy, if you do not accept the terms of this Policy, is to discontinue your use of the Service or the Web Site as applicable. Poa reserves the right, in its sole discretion, to make changes to this Policy. The latest version of this Policy, to which you will be bound, will be displayed on the Web Site We encourage you to regularly check this Policy for any updates.

USE OF THE WEB SITE

What information does Poa collect when I use the Web Site?

When you use the Web Site, Poa collects two (2) general types of information: (1) Personal Information; and (2) Anonymous Information (collectively "Information")

1 "Personal Information" as used herein means data that allows someone to identify or contact you, including, your name, telephone number, e-mail address, title, company name, as well as any other non-public information about you that is associated with or linked to any of the foregoing information.

2 "Anonymous Information" means data that is not associated with or linked to your Personal Information, such as the web pages you visit on the Web Site; Anonymous Information does not permit the identification of specific individual persons.

How does Poa collect Information from the Web Site and how will it be used?

Poa collects information from you in various ways when you use the Web Site:
1 Active Information Collection: If you provide us feedback, contact us via e-mail, raise a trouble ticket for the Service, contact us via social media, register for an account or respond to an employment opportunity posted on the Web Site, we will collect information such as your name, phone number and e-mail address, as well as any other content included in the e-mail and any information that you submit to us. Poa may then use that information for feedback purposes, marketing purposes, hiring purposes, statistical purposes, improvement in customer service, customize your experience when using the Web Site or Service, and/or for new product development.

2 Passive Information Collection: As you navigate through the Web Site, certain Anonymous Information and non-anonymous information can be passively collected (that is, gathered without your actively providing the information) using various technologies, such as cookies,

Internet tags or web beacons, and navigational data collection (log files, server logs, click-stream). Your Internet browser automatically transmits to the Web Site some of this Anonymous Information, such as the URL of the website you just came from and the Internet Protocol (IP) address and the browser version your computer is currently using. The Web Site may use such passively collected Anonymous Information to provide better service to Web Site visitors, customize the site based on your preferences, compile and analyze statistics and trends, and otherwise administer and improve the Web Site for your use.

3   Poa may also use "cookies" and similar technology to obtain information about your visits to the Web Site or your responses to e-mail or other messages from us-both individually and in aggregated data that does not identify you. These reporting tools tell us the parts of our Web Site or e-mails in which you showed an interest or took some action, and help us improve the quality and usefulness of our Web Site. Poa primarily uses cookies to determine what services or promotions you are interested in. We use both session ID cookies and persistent cookies on this Web Site. A session ID cookie expires when you close your browser. A session ID cookie helps Poa to improve your experience while visiting the Web Site. A persistent cookie remains on your computer or mobile device for an extended period of time. We set a persistent cookie to store your passwords, so you don't have to enter it more than once. By using the Web Site and/or using any Service provided via the Web Site you agree to the above use of cookies.

The use of cookies by our partners, affiliates, tracking utility company, and service providers is not covered by our privacy policy. We do not have access or control over these cookies. Our partners, affiliates, tracking utility company and service providers use session ID cookies to understand usage patterns on the Website.

If you prefer not to receive cookies while browsing the Web Site, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser, although you may not be able to take full advantage of the Site if you do so. In particular, you may be required to accept cookies in order to complete certain actions on the Web Site.

4   If you subscribe to our newsletter(s) or other promotional material, we will use your name, email address and mobile phone number to send the newsletter to you. If you no longer wish to receive our newsletters you can follow the unsubscribe instructions contained in the communications, you receive.

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if the Service is temporarily suspended for maintenance, we might send you an email or an SMS message. Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

5   Our Web Site includes social media features ("**Social Media Features**"), such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

USE OF THE SERVICE

What information does Poa collect when I use the Service?

Poa will collect: (a) your username/login-id; (b) your domain (c) IP address; and (c) other information as provided. While using the Service, Poa may also collect Session Data. "**Session Data**" as used herein means that information and data regarding you and anyone you allow to use the Service which is collected by virtue of providing you with the Service and is necessary for the billing and maintenance of the Service. This may include, by way of example only: (a) authentication domain and user name/identification; (b) date, time and duration of session; (c) amount of data transferred during the session; (d) technical or network data provided to or obtained by Poa in connection with the provision of Services; (e) location where the Service was used, as well as the name of a Wi-Fi hotspot used by you; (f) information about the make, model, operating system and other characteristics of the device on which you use the Service; (g) the location of your device when you use the Service; and (h) the identity of software applications running on your device while the Service is being provided (i) web sites you visit on the Internet.

How does Poa use the Session Data it collects?
Poa will use Session Data in connection with your use of the Poa Service only for purposes related to providing you with the Service or otherwise so as to improve the Service. Poa will use and process your Session Data: (a) in connection with provisioning of the Service; (b) to incorporate your Session Data into databases controlled by Poa for administration, provisioning, billing and reconciliation, verification of your identity and solvency, maintenance, support and product development, fraud detection and prevention, customer and customer use analysis and reporting, customization of the Service, and customer-directed application of policies as part of our service delivery. Poa may also use Session Data to contact third parties in connection with inappropriate use of the Service or violation of the Acceptable Use Policy or terms of use for the Service.

Service Provider, Sub-Processors/Onward Transfer
Poa may transfer personal information to companies that help us provide the Service.

Data Retention
Poa will retain personal data we process on behalf of our customers for as long as needed to provide the Service and Web Site to our customers. Poa will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Service Users
When you directly register to use our Service you will be asked to provide information in order to set up a Service account. As part of this process, Poa will collect personal information related to your account such as: (a) your email address; (b) password; (c) login-id; (d) credit card or mobile wallet information; (e) mobile phone numbers and (f) billing address.

How does Poa use and store my payment information?
If you pay for the Service directly through your personal credit card or mobile wallet, Poa' third party payment processing vendor will collect your credit card information, mobile phone number, billing address and other necessary billing information and Personal Information.

GENERAL TERMS

Does Poa share any of my Information or Session Date with third parties?
Except as otherwise stated herein, Poa does not sell, trade, or share your Personal Information with third parties unless you ask or authorize Poa to do so.

Subject to the terms of this Policy, Poa may share Information or Session Data with third parties for provisioning of the Service, billing and reconciliation, verification of your identity, an email service provider to send out emails on our behalf, maintenance and support, and fraud detection and prevention. When you sign up for our services, we will share your personal information only as necessary for the third party to provide that service.

Poa may disclose Information and Session Data if you breach this Policy, or any other applicable Poa policy related to the Service and/or the Web Site in order to enforce protection of Poa' rights and those of third parties. Poa may also disclose Information and Session Data to any state, federal or international governmental agency if required to do so by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

Poa may share Information or Session Data with any of its affiliates, in which case, any such affiliate shall honour the terms of this Policy.

Poa reserves the right to transfer all Information and Session Data in its possession to a successor entity in the event of a merger, acquisition, bankruptcy or other sale of all or a portion of Poa' assets or business. Other than to the extent ordered by a court, the use and disclosure of all transferred information will be subject to this Policy or to a new privacy policy if you are given notice of that new privacy policy. Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by the successor entity. You will be notified via prominent notice on our Web site for 30 days of any such change in ownership or control of your personal information.

How can I request Poa to cease using and collecting my Information?

If you have any complaints relating to this Policy, or if you would like request access to, correction of, or deletion of your Personal Information, or if you would like to request that Poa stop using your Personal Information for certain activities, including for marketing purposes, send an e-mail to privacy@poa.co.ke giving specific details of your request. With respect to any request for deletion, please note that we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We will respond to requests for access within 30 days. Please note that if you request we delete your Personal Information we may no longer be able to provide the Services to you or provide access to the Web Site.

We will retain your information for as long as your Account is active or as needed to provide you Services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How does Poa keep and protect my Information?

Keeping information about you secure is very important to Poa. To this end, Poa uses commercially reasonable protection technology such as encryption (when you provide us with sensitive information such as login credentials), firewalls and other security procedures to help protect the accuracy and security of the Information and Session Data and to help prevent unauthorized access or improper use. For example, you will note that while using some features of the Web Site, you will

need to submit a password or some other type of authenticating information.

While Poa strives to protect the Information it gathers, no data transmission over the Internet can be guaranteed to be totally secure and therefore Poa cannot ensure or warrant the security of any Information or Session Data obtained. You provide information via use of the Web Site at your own risk. If you have any questions about security on our Web site, you can contact us at security@poa.co.ke

Further Disclosures

Our Web Site may contain publicly accessible blogs or community forums. You should be aware that any information provided in these areas may be read, collected and used by others who access them. To request removal of any Personal Information for our blog or community forum, contact us at privacy@poa.co.ke. In some cases Poa may not be able to remove your Personal Information, in which case Poa will let you know if it is unable to do so and why.

When you use the Service, Poa may be able to identify your location. Location information may be required in order to provide the Service and customize your use of the Service and Web Site. Location information shall not be used for any purpose beyond what is necessary for Poa to provide the Service.

Depending on your Service pricing plan you may be entitled to access WiFi hotspots provided by third parties. Third parties are under no obligation to comply with this Policy with respect to information that you provide directly to those third parties or that those third parties collect for themselves.

Poa does not control the third-party sites that may be accessible through this Web Site or through the use of the Services. Thus, this Policy does not apply to information provided to third-party sites or gathered by the third parties that operate them. Before visiting a third-party site and before providing any information to any third party, you should inform yourself of the privacy policies and practices (if any) of the third party, and should take those steps necessary, in your discretion, to protect your privacy.

We may update this Policy to reflect changes to our information practices. The latest version of this Policy will always be displayed on the Web Site. We encourage you to periodically review this Policy for the latest information on our privacy practices.

If you have any questions regarding our privacy policy or practices contact us at privacy@poainternet.net or via postal mail at

      PRIVACY REQUESTS
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