



PRIVACY POLICY

Version 1.0

Issued By

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Document Owner

Legal Department
Asazia Technologies Limited

Applicable To

This Privacy Policy applies to all users of the miGuy Platform, including but not limited to:

- Customers
- Individual Service Providers
- Business Service Providers
- Verified Service Providers
- Premium Subscribers
- Corporate Accounts
- Website Visitors
- Mobile Application Users
- Job Applicants
- Customer Support Users
- Business Partners interacting with the Platform
- Any individual whose personal data is processed by Asazia Technologies Limited in connection with the miGuy Platform

Effective Date: 1st August 2026.

Document Classification: Public Legal & Privacy Policy

OFFICIAL NOTICE

At **Asazia Technologies Limited**, protecting personal information is fundamental to maintaining the trust placed in the **miGuy** Platform.

This Privacy Policy explains how Asazia Technologies Limited collects, uses, stores, protects, shares and otherwise processes personal data when individuals access or use the miGuy Platform.

This Policy has been prepared with reference to applicable laws including, where relevant:

- The Constitution of Kenya, 2010 (including the right to privacy);
- The Data Protection Act, 2019 (Kenya);
- The Data Protection (General) Regulations, 2021;
- The Data Protection (Registration of Data Controllers and Data Processors) Regulations, 2021;
- The Computer Misuse and Cybercrimes Act, 2018;
- The Kenya Information and Communications Act;
- The Consumer Protection Act;
- Applicable tax, employment, anti-money laundering and law enforcement requirements; and
- International privacy best practices, to the extent consistent with Kenyan law.

This Privacy Policy should be read together with the:

- miGuy Terms of Use & Services Agreement;
- Cookie Policy;
- Community Guidelines;
- Dispute Resolution & Claims Policy;
- Verification Policy;
- Acceptable Use Policy;
- Refund Policy; and
- any additional legal policies published by Asazia Technologies Limited.

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1. PURPOSE OF THIS PRIVACY POLICY

1.1 Purpose

The purpose of this Privacy Policy is to explain, in a transparent and comprehensive manner, how Asazia Technologies Limited processes personal data in connection with the operation of the miGuy Platform.

This Policy is intended to:

- inform individuals about the personal data collected;
- explain why such information is collected;
- describe how information is used;
- explain when information may be shared;
- outline data security measures;
- explain users' legal rights;
- describe data retention practices;
- explain international transfers where applicable; and
- demonstrate compliance with applicable data protection laws.

1.2 Commitment to Privacy

Asazia Technologies Limited recognises that privacy is a fundamental right and is committed to processing personal data lawfully, fairly, transparently and responsibly.

Privacy considerations are incorporated into the design, development and operation of the miGuy Platform through appropriate governance, technical safeguards and organisational measures.

1.3 Trust Framework

The miGuy Platform relies upon trust between Customers, Service Providers and Asazia Technologies Limited.

Responsible handling of personal information forms an essential part of that trust framework.

2. SCOPE OF APPLICATION

2.1 Persons Covered

This Policy applies to all individuals whose personal information is processed through the miGuy Platform, including:

- registered Customers;
- Individual Service Providers;
- Business Service Providers;
- company representatives;

- authorised users of business accounts;
- prospective users;
- website visitors;
- mobile application users;
- customer support users;
- marketing subscribers;
- applicants seeking verification;
- individuals interacting with miGuy through social media or other communication channels; and
- any other person whose personal data is processed in connection with the Platform.

2.2 Activities Covered

This Policy applies whenever personal data is processed during activities including:

- account registration;
- identity verification;
- business verification;
- service listings;
- booking requests;
- communications;
- payment facilitation;
- customer support;
- ratings and reviews;
- fraud prevention;
- dispute management;
- trust and safety investigations;
- marketing communications;
- analytics;
- Platform improvements; and
- compliance with legal obligations.

2.3 Geographic Scope

This Privacy Policy applies regardless of where a User is located when using the Platform, subject to applicable laws governing the processing of personal data.

3. DEFINITIONS

Unless the context requires otherwise:

"Personal Data" means any information relating to an identified or identifiable natural person.

"Processing" includes collecting, recording, organising, storing, adapting, retrieving, consulting, using, disclosing, transmitting, restricting, deleting or destroying personal data.

"Data Subject" means the individual to whom personal data relates.

"Controller" means Asazia Technologies Limited when determining the purposes and means of processing personal data.

"Processor" means a person or organisation processing personal data on behalf of Asazia Technologies Limited.

"Customer" means an individual requesting services through miGuy.

"Service Provider" means an individual or business offering services through the Platform.

"Platform" means the miGuy mobile applications, website, APIs and related digital services.

"Verification Data" means documents or information submitted for identity, business or professional verification.

"Applicable Law" means all laws, regulations, directives and legally binding requirements applicable to the processing of personal data.

4. PRIVACY PRINCIPLES

Asazia Technologies Limited is committed to processing personal data in accordance with the following principles.

4.1 Lawfulness

Personal data shall be processed only where there is a lawful basis under applicable law.

4.2 Fairness

Personal data shall be processed in a manner that is fair and respectful of the rights and legitimate expectations of individuals.

4.3 Transparency

Users shall be provided with clear information regarding the collection and use of their personal data.

4.4 Purpose Limitation

Personal data shall be collected for specified, explicit and legitimate purposes and shall not be processed in a manner incompatible with those purposes unless permitted by law.

4.5 Data Minimisation

Only personal data reasonably necessary for identified purposes shall be collected and processed.

4.6 Accuracy

Reasonable steps shall be taken to ensure that personal data remains accurate, complete and up to date.

4.7 Storage Limitation

Personal data shall not be retained longer than reasonably necessary, except where retention is required by law or legitimate business needs.

4.8 Integrity and Confidentiality

Appropriate technical, organisational and administrative safeguards shall be implemented to protect personal data against unauthorised access, alteration, disclosure, loss or destruction.

4.9 Accountability

Asazia Technologies Limited accepts responsibility for demonstrating compliance with applicable privacy and data protection obligations.

5. CATEGORIES OF PERSONAL DATA COLLECTED

Depending on how the Platform is used, Asazia Technologies Limited may collect and process the following categories of personal data.

5.1 Identity Information

This may include:

- full name;
- surname;
- other names;
- date of birth;
- gender;
- national identification number;
- passport number where applicable;
- profile photograph;
- selfie images for verification;
- signature where required; and
- verification status.

5.2 Contact Information

Including:

- mobile telephone numbers;

- email addresses;
- postal addresses;
- county;
- city or town;
- neighbourhood;
- GPS location where authorised;
- emergency contact information where voluntarily provided.

5.3 Account Information

Including:

- username;
- encrypted passwords;
- authentication credentials;
- account preferences;
- language settings;
- notification preferences;
- profile information; and
- subscription status.

5.4 Professional Information

For Service Providers, this may include:

- profession or trade;
- skills;
- licences;
- certifications;
- academic qualifications;
- professional memberships;
- years of experience;
- portfolio information;
- service categories;
- business registration details;
- tax information where required; and
- insurance information where voluntarily provided or legally required.

5.5 Transaction Information

Including:

- booking history;
- quotations;
- invoices;
- receipts;
- payment references;
- cancellation records;

- dispute records;
- refund information;
- ratings;
- reviews; and
- customer support interactions.

5.6 Technical Information

This may include:

- IP address;
- device identifiers;
- operating system;
- browser type;
- application version;
- network information;
- log files;
- crash reports;
- diagnostic information; and
- security event records.

5.7 Location Information

Subject to User permissions and applicable law, miGuy may process:

- precise GPS location;
- approximate location;
- service locations;
- booking locations;
- travel routes where relevant to Platform functionality; and
- other location information necessary to facilitate services.

5.8 Communications

The Platform may process communications including:

- customer support correspondence;
- in-app messages;
- service-related notifications;
- emails;
- SMS communications;
- push notifications; and
- records of communications conducted through official Platform channels.

6. SOURCES OF PERSONAL DATA

Personal data may be obtained from:

- information provided directly by Users;
- identity verification submissions;
- business registration documents;
- booking activities;
- payment transactions;
- customer support interactions;
- cookies and similar technologies;
- device information;
- third-party verification providers engaged by miGuy;
- payment service providers;
- publicly available sources where legally permitted; and
- other lawful sources relevant to the operation of the Platform.

7. SPECIAL CATEGORIES OF PERSONAL DATA

Asazia Technologies Limited does not intentionally collect or process special categories of personal data unless:

- required by law;
- necessary to establish, exercise or defend legal claims;
- voluntarily provided for a legitimate Platform purpose;
- required for identity verification;
- necessary to protect vital interests; or
- otherwise authorised under applicable law.

Where such information is processed, additional safeguards appropriate to the nature and sensitivity of the information shall be implemented.

8. ACCURACY OF PERSONAL INFORMATION

Users are responsible for ensuring that the personal information they provide to miGuy is accurate, complete and up to date.

Users should promptly update their account information whenever relevant details change, including contact information, professional qualifications, licences or business registration details.

Knowingly providing false or misleading personal information may result in suspension, withdrawal of verification, termination of an account or other enforcement measures under the miGuy Terms of Use & Services Agreement.

Volume II

9. LAWFUL BASES FOR PROCESSING PERSONAL DATA

9.1 General Principle

Asazia Technologies Limited processes personal data only where there is a lawful basis under applicable law.

Depending on the circumstances, one or more lawful grounds may apply simultaneously.

9.2 Performance of a Contract

Personal data may be processed where necessary to:

- create user accounts;
- verify identities;
- facilitate bookings;
- connect Customers with Service Providers;
- process transactions;
- provide customer support;
- manage disputes;
- administer subscriptions;
- enforce contractual obligations; and
- otherwise perform services requested through the miGuy Platform.

9.3 Legal Obligations

Personal information may be processed where necessary to comply with legal or regulatory obligations, including obligations relating to:

- taxation;
- accounting;
- financial reporting;
- anti-money laundering requirements;
- fraud prevention;
- court orders;
- regulatory investigations;
- law enforcement requests;
- record retention obligations; and
- compliance with applicable legislation.

9.4 Legitimate Business Interests

Subject to applicable law, Asazia Technologies Limited may process personal data where necessary for legitimate business interests, including:

- maintaining Platform security;
- fraud prevention;
- identity verification;
- quality assurance;
- service improvement;
- analytics;
- operational management;
- product development;
- cybersecurity;
- enforcing Platform policies;
- defending legal claims; and
- protecting Users and the integrity of the marketplace.

Such processing is undertaken only where those interests are not overridden by the rights and freedoms of Data Subjects.

9.5 Consent

Where required by law, Asazia Technologies Limited will obtain the User's consent before processing personal data for specific purposes, including certain marketing communications, optional location services, or non-essential cookies.

Users may withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.

9.6 Vital Interests

Personal information may be processed where reasonably necessary to protect the life, health or safety of an individual.

9.7 Public Interest

Where authorized by applicable law, personal information may be processed for reasons of substantial public interest or in the exercise of official authority.

10. HOW WE USE PERSONAL INFORMATION

Asazia Technologies Limited uses personal information solely for legitimate and lawful purposes connected with the operation of the miGuy Platform.

10.1 Account Administration

Personal data may be used to:

- register Users;
- authenticate identities;
- maintain user profiles;
- manage subscriptions;
- update account information;
- recover accounts;
- prevent unauthorized access; and
- administer Platform functionality.

10.2 Identity & Business Verification

Verification information may be used to:

- confirm identities;
- verify businesses;
- validate licences;
- review professional qualifications;
- confirm certifications;
- assess eligibility for verification badges; and
- strengthen trust within the Platform.

Verification reduces risk but does not constitute a guarantee of future conduct or service quality.

10.3 Facilitating Services

Information may be used to:

- connect Customers and Service Providers;
- display relevant listings;
- process bookings;
- coordinate appointments;
- facilitate communications;
- process cancellations;
- support dispute resolution;
- improve service matching; and
- maintain booking records.

10.4 Payments

Personal information may be processed to:

- facilitate secure payments;
- issue invoices;

- process refunds;
- detect payment fraud;
- reconcile transactions;
- comply with financial regulations; and
- maintain accounting records.

Where payment processing is provided by third-party payment providers, miGuy does not ordinarily store complete payment card information.

10.5 Customer Support

Personal data may be processed to:

- respond to enquiries;
- investigate complaints;
- resolve disputes;
- provide technical assistance;
- improve customer service; and
- monitor service quality.

10.6 Platform Improvement

Information may be analysed to:

- improve usability;
- enhance reliability;
- identify software defects;
- optimise performance;
- introduce new features;
- improve accessibility;
- personalise user experiences where appropriate; and
- develop future products and services.

10.7 Legal Protection

Information may be processed to:

- establish legal rights;
- investigate misconduct;
- prevent fraud;
- enforce Platform policies;
- defend legal claims;
- comply with court proceedings; and
- protect Users, employees and business interests.

11. SHARING & DISCLOSURE OF PERSONAL DATA

11.1 General Principle

Asazia Technologies Limited does not sell Users' personal information.

Personal information is disclosed only where there is a lawful reason to do so.

11.2 Sharing Between Customers & Service Providers

To facilitate bookings, limited personal information may be shared between Users, including:

- first name;
- contact details where necessary;
- service location;
- booking information;
- verification status;
- ratings;
- reviews; and
- other information reasonably required to complete a booking.

Only information necessary for the relevant transaction will ordinarily be shared.

11.3 Service Providers

Asazia Technologies Limited may share information with carefully selected service providers performing functions such as:

- payment processing;
- cloud hosting;
- customer support;
- messaging services;
- identity verification;
- fraud prevention;
- cybersecurity;
- analytics;
- document storage;
- communication services; and
- technical maintenance.

Such providers are contractually required to protect personal information and process it only for authorised purposes.

11.4 Corporate Transactions

Where miGuy undergoes a merger, acquisition, restructuring, investment, asset sale or similar corporate transaction, relevant personal information may be transferred to the extent permitted by applicable law and subject to appropriate confidentiality obligations.

11.5 Legal Disclosure

Personal information may be disclosed where reasonably necessary to:

- comply with applicable law;
- satisfy lawful court orders;
- respond to lawful regulatory requests;
- investigate criminal activity;
- prevent fraud;
- protect legal rights;
- protect public safety; or
- enforce contractual obligations.

12. THIRD-PARTY SERVICE PROVIDERS & DATA PROCESSORS

Asazia Technologies Limited may engage reputable third-party organisations to support the operation of the Platform.

These organisations may include:

- cloud infrastructure providers;
- payment processors;
- identity verification providers;
- email service providers;
- SMS providers;
- push notification providers;
- customer support software providers;
- cybersecurity providers;
- analytics providers;
- fraud detection partners;
- mapping and geolocation providers;
- business intelligence platforms; and
- other technical service providers.

Where third parties process personal data on behalf of miGuy, they are required to:

- implement appropriate security measures;
- process information only in accordance with documented instructions;
- maintain confidentiality;
- assist with regulatory compliance where applicable; and

- return or securely delete information upon completion of their services where appropriate.

13. INTERNATIONAL DATA TRANSFERS

The miGuy Platform may utilise cloud infrastructure or service providers located outside Kenya.

Where personal information is transferred internationally, Asazia Technologies Limited will implement reasonable safeguards consistent with applicable law, including:

- contractual safeguards;
- technical security controls;
- encryption where appropriate;
- access restrictions;
- transfer risk assessments where required; and
- any additional safeguards required under the Data Protection Act, 2019.

International transfers will be undertaken only where legally permissible.

14. COOKIES & SIMILAR TECHNOLOGIES

The miGuy Platform uses cookies and similar technologies to:

- authenticate Users;
- maintain sessions;
- remember preferences;
- improve security;
- analyse Platform performance;
- understand usage patterns;
- enhance functionality;
- support fraud prevention; and
- improve user experience.

Further information regarding cookies is available in the separate miGuy Cookie Policy.

Users may manage cookie preferences through browser settings or Platform cookie controls where available.

15. ARTIFICIAL INTELLIGENCE, PROFILING & AUTOMATED DECISION-MAKING

15.1 Responsible Innovation

Asazia Technologies Limited may utilise artificial intelligence, machine learning or automated systems to improve the safety, efficiency and reliability of the Platform.

15.2 Examples of Automated Processing

Automated systems may assist with:

- fraud detection;
- suspicious activity monitoring;
- spam detection;
- duplicate account identification;
- identity verification support;
- risk scoring;
- Platform security monitoring;
- abuse detection;
- content moderation assistance;
- recommendation systems; and
- service matching.

15.3 Human Oversight

Where automated systems significantly influence important decisions affecting Users, appropriate human review may be undertaken where required by law or internal governance procedures.

Automated tools are intended to support, not replace, fair decision-making.

16. MARKETING COMMUNICATIONS

Users may receive communications regarding:

- Platform updates;
- new features;
- promotions;
- educational content;
- service announcements;
- newsletters;
- surveys; and
- other information relating to miGuy.

Where required by law, marketing communications will be sent only with the User's consent or another lawful basis.

Users may unsubscribe from marketing communications at any time using the unsubscribe mechanism provided or by adjusting their communication preferences.

Operational and security communications necessary for the functioning of the Platform may continue even where marketing preferences have been withdrawn.

17. COMMUNICATIONS, NOTIFICATIONS & PLATFORM MESSAGING

Asazia Technologies Limited may communicate with Users through:

- in-app notifications;
- email;
- SMS;
- telephone calls where appropriate;
- push notifications;
- customer support channels; and
- other electronic communication methods associated with the Platform.

Communications may include:

- booking confirmations;
- payment updates;
- verification requests;
- security alerts;
- password reset messages;
- dispute notifications;
- account status changes;
- policy updates;
- legal notices; and
- important operational announcements.

Users remain responsible for maintaining accurate contact information to ensure timely receipt of important communications.

18. DATA RETENTION & SECURE DISPOSAL

18.1 General Principle

Asazia Technologies Limited retains personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected, comply with legal obligations, resolve disputes, enforce contractual rights and maintain the integrity and security of the miGuy Platform.

18.2 Retention Factors

Retention periods may vary depending on:

- the nature of the personal data;
- the purpose of processing;
- applicable statutory limitation periods;
- legal and regulatory requirements;
- tax and accounting obligations;
- ongoing investigations;
- dispute resolution proceedings;
- fraud prevention requirements;
- cybersecurity obligations; and
- legitimate business needs.

18.3 Account Information

Account information may be retained while an account remains active and thereafter for an appropriate period where necessary to:

- comply with legal obligations;
- investigate fraud;
- resolve disputes;
- enforce contractual obligations;
- maintain audit records; or
- protect the rights of Users or Asazia Technologies Limited.

18.4 Verification Records

Identity verification records, professional qualifications and business verification documents may be retained for appropriate periods necessary to:

- maintain marketplace integrity;
- comply with regulatory obligations;

- prevent identity fraud;
- support future verification reviews;
- establish legal claims; or
- defend legal proceedings.

18.5 Secure Disposal

When personal data is no longer required, Asazia Technologies Limited will take reasonable steps to securely delete, anonymize or irreversibly destroy such information in accordance with applicable law and internal retention policies.

19. INFORMATION SECURITY & CYBERSECURITY MEASURES

19.1 Commitment to Security

Asazia Technologies Limited implements reasonable technical, organisational and administrative safeguards designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

19.2 Security Measures

Security controls may include:

- encryption of data in transit;
- encryption of sensitive data at rest where appropriate;
- secure authentication mechanisms;
- multi-factor authentication for administrative access where applicable;
- role-based access controls;
- least-privilege access principles;
- network segmentation;
- firewalls;
- intrusion detection and prevention systems;
- malware protection;
- vulnerability assessments;
- penetration testing;
- audit logging;
- continuous monitoring;
- backup and disaster recovery procedures; and
- physical security controls for infrastructure where applicable.

19.3 Employee Confidentiality

Employees, contractors and authorised representatives with access to personal information are required to:

- maintain confidentiality;

- process data only for authorised purposes;
- comply with internal privacy and security policies; and
- receive appropriate privacy and security awareness training where applicable.

19.4 User Responsibilities

Users are responsible for taking reasonable steps to protect their own accounts, including:

- maintaining strong passwords;
- safeguarding authentication credentials;
- avoiding password sharing;
- promptly reporting suspected account compromise;
- securing their devices; and
- keeping application software reasonably up to date.

19.5 No Absolute Security Guarantee

While Asazia Technologies Limited employs reasonable security measures, no information technology system or method of electronic transmission can be guaranteed to be completely secure.

Accordingly, no representation or warranty is made that unauthorised access, cyberattacks or security incidents will never occur.

20. USER RIGHTS UNDER APPLICABLE DATA PROTECTION LAWS

Subject to applicable law, Users may exercise certain rights concerning their personal information.

20.1 Right to Be Informed

Users have the right to receive clear information regarding the collection and processing of their personal data.

20.2 Right of Access

Users may request confirmation as to whether Asazia Technologies Limited processes their personal data and may request access to such information, subject to lawful limitations.

20.3 Right to Rectification

Users may request correction of inaccurate, incomplete or outdated personal information.

20.4 Right to Erasure

Where permitted by applicable law, Users may request deletion of personal data that is no longer required or is being processed unlawfully.

This right is not absolute and may be limited where retention is required by law or for the establishment, exercise or defence of legal claims.

20.5 Right to Restrict Processing

Users may request that processing of certain personal data be temporarily restricted in circumstances recognised by applicable law.

20.6 Right to Object

Users may object to certain processing activities where such objection is recognised by applicable law.

Asazia Technologies Limited will consider each request in accordance with legal requirements and legitimate business interests.

20.7 Right to Data Portability

Where legally applicable and technically feasible, Users may request that certain personal data be provided in a structured, commonly used and machine-readable format or transmitted to another controller where appropriate.

20.8 Right Not to Be Subject Solely to Certain Automated Decisions

Where applicable law provides such rights, Users may request human review of significant decisions based solely on automated processing.

21. ACCESS, CORRECTION & DATA PORTABILITY REQUESTS

21.1 Submission of Requests

Requests relating to personal data should be submitted through official miGuy customer support channels or other designated privacy contact points.

21.2 Identity Verification

Before acting upon a request, Asazia Technologies Limited may require reasonable verification of the identity of the requesting individual to prevent unauthorised disclosure.

21.3 Response Time

Requests will be handled within reasonable periods consistent with applicable law, taking into account the complexity of the request and any legal limitations.

21.4 Refusal of Requests

Where a request cannot lawfully be fulfilled, Asazia Technologies Limited will, where appropriate, explain the reasons for the refusal, subject to applicable legal restrictions.

22. WITHDRAWAL OF CONSENT & OBJECTIONS TO PROCESSING

Where processing is based on consent, Users may withdraw that consent at any time.

Withdrawal of consent:

- does not affect the lawfulness of processing undertaken before withdrawal;
- may affect the availability of certain Platform features;
- does not prevent processing required by law or contract; and
- does not affect processing based on another lawful basis.

Users may also object to certain processing activities where recognised by applicable law.

23. CHILDREN'S PRIVACY

23.1 General Policy

The miGuy Platform is intended for individuals who have the legal capacity to enter into binding agreements under applicable law.

23.2 Minors

Asazia Technologies Limited does not knowingly collect personal information directly from children where such collection is prohibited by applicable law.

Where it becomes aware that personal information has been collected contrary to applicable legal requirements, reasonable steps will be taken to delete or otherwise lawfully manage such information.

23.3 Parental or Guardian Involvement

Where required by applicable law, parental or guardian consent shall be obtained before processing the personal data of children.

24. PERSONAL DATA BREACH MANAGEMENT

24.1 Commitment

Asazia Technologies Limited maintains procedures designed to detect, investigate, contain and respond to actual or suspected personal data breaches.

24.2 Response Measures

Where a personal data breach is suspected, miGuy may:

- activate incident response procedures;
- contain the incident;
- investigate root causes;
- preserve evidence;
- assess risks to affected individuals;
- implement remedial measures;
- strengthen security controls; and
- document the incident.

24.3 Regulatory Notification

Where required by applicable law, appropriate regulatory authorities may be notified within legally prescribed timeframes.

24.4 User Notification

Where required by law or where appropriate to reduce harm, affected Users may be informed of material personal data breaches together with reasonable guidance regarding protective measures.

25. GOVERNMENT, REGULATORY & LAW ENFORCEMENT REQUESTS

Personal information may be disclosed where reasonably necessary to:

- comply with lawful court orders;
- satisfy legal obligations;
- cooperate with competent regulatory authorities;
- respond to lawful law enforcement requests;
- investigate fraud;
- prevent serious crime;
- protect public safety;
- safeguard the rights of Users; or
- establish, exercise or defend legal claims.

All disclosures will be limited to the extent reasonably necessary and consistent with applicable law.

26. DATA PROTECTION GOVERNANCE & COMPLIANCE

26.1 Governance

Asazia Technologies Limited maintains internal governance measures designed to promote responsible processing of personal information.

These measures may include:

- privacy policies;
- information security policies;
- employee confidentiality obligations;
- privacy impact assessments where appropriate;
- vendor due diligence;
- access controls;
- audit processes;
- incident response procedures; and
- periodic compliance reviews.

26.2 Privacy by Design

Privacy considerations are incorporated into the planning, development and operation of Platform features where reasonably practicable.

26.3 Accountability

Management remains responsible for promoting compliance with applicable privacy obligations and fostering a culture of responsible data protection throughout the organisation.

27. CROSS-BORDER REGULATORY COOPERATION

Where personal information is processed across jurisdictions, Asazia Technologies Limited may cooperate with competent regulators, supervisory authorities and law enforcement agencies where required or permitted by applicable law.

Such cooperation shall be conducted in a manner consistent with legal obligations, due process and the protection of Users' privacy rights.

International cooperation shall not extend beyond what is reasonably necessary for the relevant legal or regulatory purpose.

Volume IV

28. COMPLAINTS & DATA PROTECTION ENQUIRIES

28.1 Commitment to Privacy

Asazia Technologies Limited is committed to addressing privacy concerns fairly, promptly and transparently.

Users are encouraged to raise any questions or concerns regarding the processing of their personal data through the official miGuy support channels before escalating the matter to a regulatory authority, where appropriate.

28.2 Privacy Enquiries

Users may contact Asazia Technologies Limited regarding matters including:

- access to personal data;
- correction of inaccurate information;
- deletion requests;
- withdrawal of consent;
- objections to processing;
- data portability;
- privacy concerns;
- security concerns;
- suspected misuse of personal information;
- identity verification questions;
- data retention enquiries;
- cross-border data transfers; or
- any other issue relating to this Privacy Policy.

28.3 Complaint Handling

Upon receiving a privacy complaint, Asazia Technologies Limited may:

- acknowledge receipt of the complaint;
- verify the identity of the complainant where appropriate;
- investigate the relevant facts;
- request additional supporting information where reasonably necessary;
- consult relevant internal departments or service providers;
- determine whether corrective action is required; and
- communicate the outcome to the complainant within a reasonable period, subject to applicable law.

28.4 Regulatory Complaints

Nothing in this Privacy Policy limits any right a Data Subject may have under applicable law to lodge a complaint with the appropriate supervisory or regulatory authority.

29. POLICY AMENDMENTS & VERSION CONTROL

29.1 Right to Amend

Asazia Technologies Limited reserves the right to amend, revise, replace or update this Privacy Policy at any time to reflect:

- changes in legislation;
- judicial decisions;
- regulatory guidance;
- technological developments;
- changes to Platform functionality;
- operational requirements;
- cybersecurity improvements;
- changes to third-party service providers;
- international expansion; or
- legitimate business requirements.

29.2 Notification of Material Changes

Where changes materially affect the rights or obligations of Users, miGuy will make reasonable efforts to notify Users through one or more appropriate communication channels, including:

- in-app notifications;
- website notices;
- email communications;
- SMS notifications where appropriate; or
- other electronic communication methods associated with the Platform.

29.3 Continued Use

Subject to applicable law, continued access to or use of the miGuy Platform after the effective date of an updated Privacy Policy constitutes acceptance of the revised Policy.

Where express consent is legally required for specific processing activities, miGuy will obtain such consent before those changes take effect.

29.4 Version History

Previous versions of this Privacy Policy may be retained for legal, regulatory, audit and historical purposes.

30. INTERPRETATION & SEVERABILITY

30.1 Interpretation

Unless the context otherwise requires:

- words importing the singular include the plural and vice versa;
- references to one gender include all genders;
- headings are for convenience only and do not affect interpretation;
- references to legislation include amendments, subsidiary legislation and successor enactments;
- references to "including" or similar expressions mean "including without limitation"; and
- references to "writing" include electronic communications unless the context requires otherwise.

30.2 Relationship with Other Policies

This Privacy Policy forms part of the overall legal framework governing the miGuy Platform and should be read together with the:

- miGuy Terms of Use & Services Agreement;
- Community Guidelines;
- Cookie Policy;
- Dispute Resolution & Claims Policy;
- Verification Policy;
- Acceptable Use Policy;
- Refund Policy; and
- any other policies or notices published by Asazia Technologies Limited.

Where another policy specifically governs a particular subject matter, that policy shall prevail to the extent of any inconsistency.

30.3 Severability

If any provision of this Privacy Policy is held by a court or tribunal of competent jurisdiction to be invalid, unlawful or unenforceable, that provision shall be modified or severed only to the minimum extent necessary, and the remaining provisions shall remain valid and enforceable.

31. GOVERNING LAW & JURISDICTION

This Privacy Policy shall be governed by and interpreted in accordance with the laws of the Republic of Kenya.

Any dispute arising from or relating to this Privacy Policy shall be resolved in accordance with the dispute resolution procedures set out in the miGuy Terms of Use & Services

Agreement and the miGuy Dispute Resolution & Claims Policy, without prejudice to any statutory rights available under applicable data protection legislation.

32. CONTACT INFORMATION

For privacy-related enquiries, requests or complaints, Users may contact:

Asazia Technologies Limited
P.O. Box 103403–00101
Nairobi, Kenya
Email: miguyapp@gmail.com

Users are encouraged to use the official support, and help channels available through the miGuy Platform for operational privacy matters.

33. USER ACKNOWLEDGEMENT

By creating an account, accessing or using the miGuy Platform, Users acknowledge that:

- they have read this Privacy Policy;
- they understand how their personal data is processed;
- they understand their rights under applicable law;
- they agree to the processing of their personal data where processing is based on contract or another lawful basis;
- they understand that certain processing activities are necessary for the operation, security and integrity of the Platform; and
- where consent is required by law, such consent will be requested separately and may be withdrawn in accordance with this Policy.

34. FINAL LEGAL NOTICE

34.1 Marketplace Role

The miGuy Platform is operated by Asazia Technologies Limited as a technology marketplace connecting Customers with independent Service Providers.

Except where expressly stated in a separate written agreement, Asazia Technologies Limited is not the employer, contractor, subcontractor, principal or agent of Service Providers solely by virtue of their use of the Platform.

34.2 Privacy Commitment

Asazia Technologies Limited is committed to maintaining appropriate standards of privacy governance, information security and responsible data stewardship throughout the lifecycle of personal information processed through the miGuy Platform.

34.3 Reservation of Rights

Except where prohibited by applicable law, Asazia Technologies Limited reserves the right to:

- investigate suspected misuse of personal data;
- suspend processing where necessary to protect Users or the Platform;
- implement additional verification measures;
- cooperate with competent regulatory and law enforcement authorities;
- enforce this Privacy Policy; and
- take any other lawful action reasonably necessary to protect the rights, security and legitimate interests of Users and the Platform.

34.4 Intellectual Property

The miGuy name, trademarks, logos, software, mobile applications, websites, APIs, databases, verification systems, trust framework, documentation and all related intellectual property remain the exclusive property of **Asazia Technologies Limited**.

Nothing in this Privacy Policy transfers any ownership rights in such intellectual property.

35. PERSONAL DATA PROCESSING SCHEDULE (ILLUSTRATIVE)

The table below provides a high-level summary of the principal categories of personal data processed by miGuy.

Category of Personal Data	Primary Purpose	Typical Lawful Basis	Illustrative Retention Approach
Identity information	Account creation, verification	Contract, legal obligation, legitimate interests	While account is active and thereafter as required by law or legitimate business needs
Contact information	Communication, bookings, support	Contract, legitimate interests	As long as necessary for account administration and legal obligations
Professional qualifications	Verification of Service Providers	Contract, legitimate interests	While verification remains relevant and thereafter as required for compliance or dispute resolution
Business registration information	Verification of business accounts	Contract, legal obligation, legitimate interests	In accordance with legal and operational requirements
Booking records	Marketplace operations, dispute resolution	Contract, legitimate interests	In accordance with contractual, legal and audit requirements
Payment and transaction records	Payment facilitation, accounting	Contract, legal obligation	Retained for statutory accounting, tax and audit periods

Ratings and reviews	Marketplace transparency	Legitimate interests	Retained while relevant to Platform integrity, subject to applicable law
Customer support records	Complaint resolution, quality assurance	Contract, legitimate interests	As reasonably necessary for support and legal purposes
Device, technical and security logs	Cybersecurity, fraud prevention	Legitimate interests, legal obligation where applicable	Retained in accordance with security and operational requirements
Location information	Service matching and booking facilitation	Consent (where required), contract, legitimate interests	Retained only as long as reasonably necessary for operational purposes
Marketing preferences	Marketing communications	Consent or other lawful basis	Until consent is withdrawn or preferences are changed
Cookies and analytics data	Platform functionality, security and analytics	Consent (where required), legitimate interests	As described in the miGuy Cookie Policy

The specific retention period applicable to any category of personal data may vary depending on legal obligations, regulatory requirements, active disputes, fraud investigations, security needs and other legitimate operational considerations.

END OF PRIVACY POLICY

This Privacy Policy forms an integral part of the legal framework governing the miGuy Platform and should be read together with the miGuy Terms of Use & Services Agreement, Community Guidelines, Cookie Policy, Dispute Resolution & Claims Policy and all other applicable platform policies issued by Asazia Technologies Limited.