

ABRIDGED PRIVACY NOTICE

We are committed to protecting your privacy when dealing with your personal data. This Privacy Policy provides an overview of the information we collect about you and how we use and protect it. It also provides information about your rights. You can find more details in our full privacy policy available at www.cdsckenya.com.

1. Information about CDSC

In this privacy notice, references to “we” or “us” or “our” are to The Central Depository & Settlement Corporation Limited (CDSC). CDSC sometimes appoints agents known as Central Depository Agents (CDAs) who assist us in opening and maintaining your account. Maintaining your account involves account rectification, deactivation, closure and suspension of accounts, withdrawals, transfers, pledges, Releases & Foreclosure.

2. Scope of this privacy notice

This privacy notice applies to our investors/CDS account holder or anyone who interacts with us about our products and services in any way. CDSC may refer to these individuals as (“you,” “your”) in this notice.

3. How we collect your personal data

For purposes of offering our products and services to you, we collect personal data directly from you through your contact with us or indirectly from third parties who act on our behalf such as Central Depository Agents appointed pursuant to the Central Depositories Act, Share Registrars or Regulators such as the Capital Markets Authority, the Nairobi Stock Exchange or your parent or guardian where you are minor. If you give us any information about other persons, you must ensure that they have notice of this privacy notice and have consented to you disclosing such information. CDSC will not be held liable for collecting, use and storage of data that is later deemed to be provided without consent.

4. Categories of personal data we collect, use and store.

CDSC process the following categories of personal information about you:- biodata including your name, gender, photograph, contact data (telephone number, email and postal address) identification information (ID/Passport), financial data (bank account numbers, KRA PIN number, source of funds, dividend disposal preference), CDS Account Number, location data, nationality, sensitive personal data such as information relating to your gender, next of kin or your child where you open an account on behalf of your child and data relating to operation and maintenance of your account, your opinions on any of our services and information related to your online identifiers where you use our website or any app or technology to contact us or access our products and services.

5. How we use your personal data

The information you provide us can be used to provide you with information on our products and services and any changes regarding this, to open and maintain your account with CDSC, to facilitate clearing & settlement, transfers, pledges and release of pledges, share immobilisations, to prevent, detect and investigate crime, among other related purposes. Maintaining your account involves account rectification, deactivation, closure and suspension of accounts, withdrawals, inter-depository transfers and customer service. Should CDSC need to use your personal data for any other purpose aside from those listed above, CDSC will inform you beforehand. If you fail to provide CDSC with your personal data, CDSC may not be able to fulfill our contractual obligations or provide requisite services.

6. Lawful grounds for processing your personal data.

CDSC process your personal data on the following legal bases: - informed consent in the case of children’s data or if we want to contact you for direct marketing purposes, as a requirement for performance of a contractual obligation, for compliance with our legal obligations, for our legitimate interests, performance of tasks carried in public interest or in our capacity as a public authority, and for historical, statistical, journalistic, literature and art or scientific research. Where you have provided consent, you may withdraw your consent at any time.

7. Your rights and duties

You have the right to be informed of the use of your personal data. You also have the right to access to your information and to ask us to correct, erase and restrict the use of your information. Additionally, you have the right to object to your information being used by us and to receive your personal data in a structured, commonly used, and machine-readable format and to transmit the data to another data controller or data processor without any hindrance. Where you have provided consent for use of your child’s information, you may withdraw your consent at any time. You also have the right to human intervention in any automated decision-making we undertake using your data. You have a duty to promptly inform us of any changes in your personal information. If you wish to exercise any of the above rights or duties, please contact us on cdscdpo@cdsckenya.com.

8. Sharing your personal data

CDSC shares your personal data internally on a need-to-know basis. CDSC may also share your data with CDAs, regulators, share registrars and other intermediaries or entities that help us provide services to you for example our ICT service providers. We may also share your information when required to by law or court order. CDSC will take all reasonable steps to secure your data whenever we share it with third parties.

We share your personal data within CDSC, with relevant agents (CDAs), and other intermediaries and with other parties who help us provide services to you. We may also share your information when required to by law or court order. CDSC take all reasonable steps to secure your data whenever we share it with third parties.

9. Data Security

CDSC shall take appropriate technical, physical, legal, operational, and organizational measures, which are consistent with applicable privacy and data security laws and its data protection policy to ensure confidentiality, integrity, and security of your data through controls around information classification, access control, cryptography, physical and information security, environmental security and monitoring, audit and compliance. We take additional measures to secure sensitive personal data and data relating to children as prescribed by the law.

10. Data Retention and Disposal

There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not retain all data indefinitely. CDSC will immediately delete, erase, or destroy your personal data when the purpose for collecting it is met or in contemplation of other legitimate interests. However, we may retain your information, or information relating to your account after you cease to be a customer provided it is necessary for a legal, regulatory, fraud prevention or other legitimate purpose.

11. Data Protection Contacts

If you have any questions, comments, complaints or suggestions about this privacy policy, or any other concerns about the way in which we process information about you, please contact us at cdscdpo@cdsckenya.com or call us via +254202912000. Alternatively, you can write to Central Depository and Settlement Corporation Limited, Europa Towers, 10th Floor, Lantana Road, Westlands, P.O. Box 3464-00100 Nairobi We may contact you periodically to verify your personal information and to inform you of any changes.