

Part 14

A. Privacy Statement

Madison Investment Managers Limited, respects your privacy and is committed to protecting your personal data. This Privacy Statement is a summary of Madison Groups' Privacy Notice. It explains how we collect, use, disclose or otherwise process the personal data that you give to us.

What type of personal data do we process? We may process your personal data including but not limited to your; basic personal information such as name, date of birth and occupation/employment details; contact information such as phone number, email address and postal address; location data such as physical address; financial information such as bank account details, card payment details, transactional data; Investment data such as account/member number, investment knowledge, investment history; technical information such as online account information, IP address, usage data, geolocation data and device ID; multimedia data such as passport photo, audio, videos and audios; sensitive data such as property details, marital status, family details including names of a child(ren), parent(s), spouse(s), sex. This personal data is received directly from you or indirectly through your duly authorized representative, our third-party service providers or public sources. In cases where you submit personal data about another person, kindly ensure that you capture the correct information and that you have notified them that you are submitting their information to us. It is also crucial that you show them this Privacy Statement, our Privacy Notice and or direct them to us if they have any questions or concerns about the use of their personal data. Please note that we may not be able to effectively perform the contract that you have with us if you fail to provide us with the personal data that we have requested. This may lead to the cancellation of the product/ service that you have taken or wish to take.

What is the legal basis for processing your personal data? We process your personal data for various purposes ("the purposes") including but not limited to; The performance of the investment management and advisory contract that we have with you including verifying the information that you have provided, servicing the product/service that you have with us (purchases, withdrawals, due diligence) updating/changing your details, complaints handling, answering queries and concerns, payment of a claim to your legal personal representative, communicating with you on general updates relating to the product/service you have taken with us, and the general servicing and administration of the product/service you have with us; To carry out statistical analysis/market research on our products and services including or to ask feedback on our products and services; To comply with any legal, regulatory, tax, accounting or reporting obligations. Where you give your consent, particularly where we use your personal data for direct marketing, where we process personal data relating to a child and where we process personal data outside Kenya; To safeguard our legitimate interests, public interests and your vital interest including detecting & preventing fraud and the establishment, exercise and defence of a legal claim. We will limit the processing of your personal data for these purposes.

How long do we retain your personal data? We will retain your personal data for only as long as is necessary to fulfil the purposes for which it was collected as informed by legal and regulatory requirements and our internal retention policies.

Who do we share your personal data with? We share your personal data with certain third parties like suppliers or service providers with whom we have engaged for and in connection with the purposes. This may include; your agent/broker; technology service providers, the trustee; the custodian; fraud prevention and anti-money laundering agencies; credit reference agencies; financial institutions through which your transactions are processed, government agencies & public authorities (as and when we are required under the law); our reinsurers, professional advisers and other companies within the Madison Group. Some of these third parties may be located outside Kenya. We will take reasonable steps to ensure that the data we share is accurate, up-to-date, complete and relevant to the purpose of the use or disclosure. All third parties are also required to ensure the security of your data and shall strictly utilise it in connection with the purpose it is shared with them.

How can you access your data subject rights? You have the right to; be informed on the purpose for which we are processing your personal data, to access the personal data that we process, request that we correct your personal data if it is inaccurate, false or misleading, erase your personal data (this is subject to any legal obligation that we may have), object to the processing of your personal data, data portability and restrict the processing of your personal data. You may exercise any of your data subject rights by downloading the appropriate data subject action form which may be downloaded from our website at www.madison.co.ke and sending the filled form to dpo@madison.co.ke OR by sending an email to dpo@madison.co.ke

Data security. We will employ adequate organisational and technical measures to safeguard your data at all stages of processing.

Changes to this privacy statement. We may occasionally update this Privacy Statement to reflect changes in our data processing activities or legal developments. Any updates will be posted on our Privacy Notice posted on our website and the date of the last revision will be indicated at the top of the Privacy Notice.

Please visit see Madison Groups' Privacy Notice on our website at www.madison.co.ke for further information on our privacy practices. If you have any questions regarding this privacy statement or any concerns regarding the processing of your personal data, please write an email to dpo@madison.co.ke or visit our offices at Madison House, Upper Hill Close, Upper Hill, Nairobi.

B. Consent for processing Personal Data relating to a child.

The Data Protection Laws require us to obtain the parental or legal guardians' consent where we process personal data belonging to a child (Any person under 18 years). If you have provided personal data belonging to a child including beneficiaries and or next of kin, we require your consent as their parent or legal guardian.

If you are not the child's parent or legal, kindly ask us for a separate consent form to facilitate the collection of the minor's parent/legal guardians' consent.

*Please tick the appropriate box.

- I AGREE** to the processing of personal data belonging to a child/children submitted above. I understand that the Child's personal data will be processed in accordance with the Data Protection Act and Madison's' Privacy Notice.
- I DO NOT AGREE.**
- Not Applicable** (Where you have not submitted personal data belonging to a child)

C. Consent for the External Hosting of Personal Data.

Madison Investment Managers Limited our business partners and or service providers may transfer your Personal Data including your Sensitive Personal Data such as data revealing; race, health, ethnic social origin, belief, genetic data, biometric data, property details, marital status, details of your child, parents or spouses; sex and or sexual orientation (as applicable) outside Kenya. This typically occurs when we utilize software solutions or other technology services like email exchange, cloud storage, document management and storage system services). These services are embedded in our processes and are necessary to enable us to provide you with the service/product that you have engaged with us for.

Under Data Protection Laws, obtaining your consent for transferring your Sensitive Personal Data outside Kenya is mandatory. We will take measures to ensure that the country hosting your data adheres to similar data protection laws and that appropriate security safeguards are applied to safeguard your data. It is crucial to note that refusal to grant consent will prevent us from offering you the service or product that you have taken or wish to take with us. These services have been embedded into our processes and are necessary for the performance of our contractual obligation to you.

* Please tick the appropriate box below.

- I AGREE.**
- I DO NOT AGREE.**

D. Marketing consent

Madison Investment Managers Limited operates under Madison Group Limited, a locally owned financial services holding company alongside two other subsidiaries; Madison General Insurance Kenya Limited and Madison Life Assurance Limited (Collectively known as "**Madison Group**"). Together with our business partners and or third-party service providers, Madison Group would like to communicate with you about the services and products available across Madison Group. These include the latest updates, special offers, new products or services and or other promotions that we think would interest you. To ensure compliance with the Data Protection laws, we kindly request your consent to send such communications.

* Please tick the applicable box below.

- YES**, I agree to receive such communication from Madison Group and its Subsidiaries by email, text message, phone or other electronic means.
- NO**, I do not wish to receive such communication from Madison Group and its Subsidiaries

IMPORTANT: Consent is voluntary and may be withdrawn at any time by filling out the consent withdrawal form found at www.madison.co.ke and sending it to dpo@madison.co.ke **OR** by sending an email to dpo@madison.co.ke. Third parties to whom we have disclosed your personal data for that purpose will be informed of your consent withdrawal. The withdrawal will however not affect the lawfulness of the processing activities undertaken prior to withdrawal.

If you have any questions with regard to consent, please write an email to dpo@madison.co.ke

Declaration*

- I acknowledge that I have read and understood the Privacy Statement.
- I confirm that I have personally selected my choice on each respective consent and under my own free will and that I am aware that I may withdraw my consent at any time through the mechanisms provided by Madison Investments Managers Limited.

Name: _____ Signature: _____ Date: _____