

Your catalyst to a cleaner future

Accelerating the transition to clean, affordable, and reliable energy in **Somalia**, by providing accessible and innovative energy financing solutions.



Privacy Policy

OUR PRIVACY POLICY

Last updated: December 16, 2024

1. Introduction

Welcome to Sun4All Assetco Ltd (the “Company”).

The Company (“us”, “we”, or “our”) operates www.sun4-all.com (hereinafter referred to as “Service”).

Our Privacy Policy governs your visit to www.sun4-all.com, and explains how we collect, safeguard and disclose information that results from your use of our Service.

We use your data to provide and improve our Service. By using our Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions (“Terms”) govern all use of our Service and together with the Privacy Policy constitutes your agreement with us (“Agreement”).

2. Definitions

COOKIES are small files stored on your device (computer or mobile device) containing the details of your browsing history on a particular website, and other uses.

DATA CONTROLLER means the person or company who (either alone or jointly or in common with other persons) determines the purposes and manner in which any personal data are processed. For the purpose of this Privacy Policy, we are a Data Controller for the Service.

DATA PROCESSORS (OR SERVICE PROVIDERS) means any person or company who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

DATA SUBJECT is any living individual who is the subject of Personal Data.

PERSONAL DATA means any information that relates to an identified or identifiable individual.

SERVICE means the www.sun4-all.com website operated by the Company.

USAGE DATA is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).

USER is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

3. Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

4. Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Corporate name
- Phone number
- Curriculum Vitae
- Financial Information
- Address, Country, State, Province, ZIP/Postal code, City
- Cookie identifiers and Usage Data

We may use your Personal Data to contact you with newsletters, marketing, job alerts or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link.

Usage Data

We may also collect Usage Data containing information that your browser sends whenever you visit our Service or when you access our Service by or through any device.

This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access our Service with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

Location Data

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service. Session Cookies enable you to use some of the features on our Service and we use them to help to authenticate Users.
- Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
- Security Cookies: We use Security Cookies for security purposes.
- Advertising Cookies: Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

Other Data

While using our Service, we may also collect the following information: gender, age, date of birth, place of birth, passport details, citizenship, registration at place of residence and actual address, telephone number (work, mobile), details of documents on education, qualification, professional training, employment agreements, non-disclosure agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) numbers, office location and other data.

5. Use of Data

The Company uses the collected data for various purposes, including:

- to provide and maintain our Service;
- to notify you about changes to our Service;
- to allow you to participate in interactive features of our Service when you choose to do so;
- to provide customer support;
- to gather analysis or valuable information so that we can improve our Service;
- to monitor the usage of our Service;
- to detect, prevent and address technical issues;
- to fulfil any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;

- to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- in any other way we may describe when you provide the information;
- for other purposes with your consent.

6. Retention of Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

7. Transfer of Data

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the Republic of Kenya and choose to provide information to us, please note that we transfer the data, including Personal Data, to the Republic of Kenya and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to such transfer.

The Company will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the reasonable security of your data and other personal information.

8. Disclosure of Data

We may disclose personal information that we collect, or you provide:

1. Disclosure for Law Enforcement.

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.

2. Business Transaction.

If we, our subsidiaries, or any entity within the Sun4all group of companies are involved in a merger, acquisition or asset sale, your Personal Data may be transferred.

3. Other cases.

We may disclose your information also:

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third parties we use to support our business;
- to fulfill the purpose for which you provide it;
- for the purpose of including your company's logo on our website;
- for any other purpose disclosed by us when you provide the information;
- with your consent in any other cases;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company or its subsidiaries or affiliates, our customers and clients, or others.

9. Security of Data

The security of your data is important to us but remember that no method of transmission over the internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

10. Your Data Protection Rights Under the General Data Protection Regulation (GDPR)

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by GDPR.

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please email us at info@sun4-all.com.

In certain circumstances, you have the following data protection rights:

- the right to access, update or to delete the information we have on you;
- the right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
- the right to object. You have the right to object to our processing of your Personal Data;
- the right of restriction. You have the right to request that we restrict the processing of your personal information;
- the right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format;
- the right to withdraw consent. You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information;

Please note that we may ask you to verify your identity before responding to such requests. Please note, we may not be able to provide the Service without certain necessary data.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

11. Your Data Protection Rights under the California Privacy Protection Act (CalOPPA)

CalOPPA is the first state law in the United States to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivable the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy.

According to CalOPPA we agree to the following:

- Users can visit our site anonymously;
- Our Privacy Policy link includes the word “Privacy”, and can easily be found on the home page of our website;
- Users will be notified of any privacy policy changes on our Privacy Policy Page;
- Users are able to change their personal information by emailing us at info@sun4-all.com.

Our Policy on “Do Not Track” Signals:

We honor Do Not Track signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

12. Your Data Protection Rights under the California Consumer Privacy Act (CCPA)

If you are a California resident, you are entitled to learn what data we collect about you, ask to delete your data and not to sell (share) it. To exercise your data protection rights, you can make certain requests and ask us:

1. What personal information we have about you. If you make this request, we will return to you:

- The categories of personal information we have collected about you.
- The categories of sources from which we collect your personal information.
- The business or commercial purpose for collecting or selling your personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about you.
- A list of categories of personal information that we have sold, along with the category of any other company we sold it to. If we have not sold your personal information, we will inform you of that fact.
- A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with.

Please note, you are entitled to ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to the personal information we collected about you in the previous 12 months.

2. To delete your personal information. If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through de-identification of the information. If you choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate.

3. To stop selling your personal information. We don't sell or rent your personal information to any third parties for any purpose. We do not sell your personal information for monetary consideration. However, under some circumstances, a transfer of personal information to a third party, or within our family of companies, without monetary consideration may be considered a "sale" under California law. You are the only owner of your Personal Data and can request disclosure or deletion at any time.

If you submit a request to stop selling your personal information, we will stop making such transfers.

Please note, if you ask us to delete or stop selling your data, it may impact your experience with us, and you may not be able to participate in certain programs or membership services which require the usage of your personal information to function. But in no circumstances, we will discriminate against you for exercising your rights.

To exercise your California data protection rights described above, please send your request(s) by email: info@sun4-all.com.

Your data protection rights, described above, are covered by the CCPA, short for the California Consumer Privacy Act. To find out more, visit the official California Legislative Information website. The CCPA took effect on 01/01/2020.

13. Your Data Protection Rights under the Protection of Personal Information Act (PoPIA)

In line with the 8 Conditions for Lawful Procession of Personal Information as set out in the Protection of Personal Information Act no 4 of 2013 ("PoPIA"), we:

- Accept joint responsibility and accountability with you to responsibly manage and protect your Personal Information when providing our services and solutions to you;
- Undertake to collect and process only such Personal Information which is necessary given the purpose for which it is processed and to assist you with your required solutions, conclude the necessarily related agreements and consider the legitimate legal interests of everyone concerned, as required by the PoPIA. We will at all times respect your right to withdraw your consent for the processing of your Personal Information;
- Undertake to only use your Personal Information for the purpose for which the information is essential to enable us to assist you or provide solutions to you;
- Undertake not to share or further process your Personal Information with anyone or for any reason if not required for assisting you with your solutions or as required in terms of legislation or regulations;
- Undertake to take reasonably practicable steps to ensure that information is complete, accurate, not misleading and, where necessary, is updated;
- Undertake to be open and transparent on the nature, extent and reasons for processing Personal Information;
- Undertake to safeguard and protect your Personal Information in our possession;
- Undertake to freely confirm what Personal Information we hold of you, to update and rectify the Personal Information upon request and to keep it for no longer than required.

14. Your Data Protection Rights under the Data Protection Act (DPA)

The Company collects, uses, discloses, retains and protects your personal information, in accordance with the Kenya Data Protection Act (DPA) 2019 and other relevant laws. The DPA imposes a number of obligations on Data Processors and Data Controllers in respect of the manner in which personal data is processed and sets out their duties to the Data Subjects.

The DPA provides that every Data controller or Data processor shall ensure that Personal Data is:

- processed lawfully, fairly and transparently in accordance with the right to privacy;
- collected for specified and legitimate purposes;
- limited to what is necessary;
- collected only where a valid explanation is provided whenever information relating to family or private affairs is required;
- accurate and, where necessary, up to date, with every reasonable step being taken to ensure that any inaccurate personal data is erased or rectified without delay; and
- kept in a form which identifies the Data Subjects for no longer than is necessary.

As a rule, a Data Controller or Data Processor ought to collect Personal Data directly from the Data Subject.

Notwithstanding the general rule on collection of data directly, the DPA provides that Personal Data may be collected indirectly where the:

- data is contained in a public record, or the data subject has deliberately made the data public;
- data subject or their duly appointed guardian has consented to the collection from another source;
- collection from another source would not prejudice the interests of the data subject;
- collection of data from another source is necessary for the:
 - a) prevention, detection, investigation, prosecution and punishment of crime;
 - b) enforcement of a law which imposes a pecuniary penalty; or
 - c) protection of the interests of the Data Subject or another person.

Section 26 of the DPA provides that a Data Subject has a right to:

- be informed of the use to which their personal data is to be put;
- access their personal data which is in the custody of data controller or data processor;
- object to the processing of all or part of their personal data;
- correction of false or misleading data; and
- deletion of false or misleading data about them.

Further, a Data Subject shall have the right to withdraw consent at any time. However, the such withdrawal of consent shall not affect the lawfulness of processing based on prior consent before its withdrawal.

A right conferred on a Data Subject may be exercised:

- If a minor, by a person who has parental authority or by a guardian;
- where the data subject has a mental or other disability, by a person duly authorised to act as their guardian or administrator; or
- in any other case, by a person duly authorised by the data subject.

To exercise your DPA rights described above, please send your request(s) by email: info@sun4-all.com.

15. Service Providers

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), provide Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

16. Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

17. CI/CD tools

We may use third-party Service Providers to automate the development process of our Service.

18. Behavioral Remarketing

We may use remarketing services to advertise on third-party websites to you after you visited our Service. We and our third-party vendors use Cookies to inform, optimize and serve ads based on your past visits to our Service.

19. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third-party’s site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

20. Children’s Privacy

Our Services are not intended for use by children under the age of 18 (“Child” or “Children”). We do not knowingly collect personally identifiable information from Children under 18. If you become aware that a Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

21. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update “effective date or last updated” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

22. Contact Us

If you have any questions about this Privacy Policy, please contact us by email: info@sun4-all.com.

AS

SUN4ALL

Contact us
for any queries:

+254 72 315 4900

info@sun4-all.com

www.sun4-all.com