

## **Simba Smile – Privacy Policy**

### **1. General information**

Your privacy is very important to all of us at Simba Smile, Ltd. (“Simba Smile”). We have established this privacy policy (“Privacy Policy”) to explain to you what kind of personal information about you may be collected and how your personal information is used and protected.

Simba Smile may at any time change, modify, or otherwise update this Privacy Policy without prior notification. The latest applicable version can be accessed at all time at <http://www.Simbadent.com>.

The privacy practices of this Privacy Policy apply to our services available through websites owned and operated by Simba Smile, such as Simba Smile.com, and including any Simba Smile platforms accessible through such websites, such as the app.Simba Smile.com or app.dropdental.com (collectively, the “Site”).

### **2. Data controller**

Data controller of your personal information is: Simba Smile, Ltd. P.O. Box 20844, 00200 Nairobi, Kenya. Phone contact: +254706343288

If you have any questions about this privacy policy or requests regarding processing of your personal information, please contact us at [simbasmile.ke@gmail.com](mailto:simbasmile.ke@gmail.com).

### **3. Personal information collected and processed by Simba Smile**

Personal information is information that allows to identify a specific person (human), e.g. name, surname, e-mail address, phone number, IP address. Sometimes only one piece of information is enough, but usually it is necessary to combine at least two of them.

Your use of the Site may include providing sensitive personal Data, as such terms is defined by the Data Protection Act No. 24 of 2019. The Act brings into play comprehensive laws that protect the personal information of individuals. Health related information are defined in the Act as sensitive Data which includes Data that reveals race, health status, ethnic social origin, conscience, belief, genetic data, biometric data, property details, marital status, family details including names of children, parents, spouse or spouses, sex or the sexual orientation.

Please check in details how Simba Smile handle with your personal information:

#### **3.1 Contact request form**

##### **Personal data collected:**

Name, Surname, Email Adress, Request.

##### **Purpose of data processing:**

- To facilitate your registration,
- to enable you to access certain services offered by Simba Smile via Site,
- to provide access to services that most likely meet your needs and preferences,

- to track certain information based upon your behaviour on the Site. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand our users,
- to detect and protect us against error, fraud and other criminal activity;
- to enforce our Terms of Use Agreement,
- to send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if access to our services is temporarily suspended for maintenance, we might send you an email.

### 3.2 Sending an email or letter to Simba Smile Ltd.

#### **Personal data collected:**

- Name, Surname, e-mail address, information provided to us in the correspondence

#### **Purpose of data processing:**

- to provide user support,
- to collect and retain such information in a file specific to you

### 3.3 When you accept Terms and Conditions

#### **Personal data collected:**

- Sensitive Personal Data in anonymized form
- Patient name and surname (and other personal data if any)\*

\* **Please notice:** Pursuant to the Data Protection Act, 2019 you are obliged to send Sensitive Personal Data in anonymized form, because Simba Smile does not need any personal data of your patients. If you do not anonymize your cases, Simba Smile receive name and surname of your patients (and other personal data if any) and process it not intentionally. In such a case Simba Smile has right to anonymize the cases before using for the purpose mentioned below and it is your obligation to have consent of your patient for such a processing.

#### **Purpose of data processing:**

- to facilitate the functionality and use of the software,
- to store data,
- to use any such transferred data for development/improvements of Simba Smile's products

### 3.4 Marketing Communication after giving consent

#### **Personal data collected:**

- e-mail address

#### **Purpose of data processing:**

- to send you information on services, special deals and promotions,
- to improve our marketing and promotional efforts,
- to analyze site usage,
- to improve our content and product offerings
- to customize the Site's content, layout and services (profiling)

#### **4. Retention and deletion of your personal information**

Simba Smile will store your personal data as long as you have an account with Simba Smile. You can always ask for data submitted by you to Simba Smile to be deleted contacting us by [simbasmile.ke@gmail.com](mailto:simbasmile.ke@gmail.com). We will delete your personal data when we no longer need to process them in relation to one or more of the purposes set out above in section 3.

Please notice that cases uploaded by you for design or/and manufacturing are deleted on a regular ( monthly ) basis at the local design centers. The design Files you can request up to six month after we send you the case.

Marketing content will be delivered to you as long as your consent to receive it is active. You can withdraw your consent at any time. To revoke your consent you may contact us by [simbasmile.ke@gmail.com](mailto:simbasmile.ke@gmail.com).

#### **5. Information Sharing and Disclosure**

As a matter of policy, we do not sell, rent or share any of your personal information, including your email address, to third parties for their marketing purposes without your explicit consent. However, the following describes some of the ways that your personal information may be disclosed in the normal scope of business to provide our services to customers:

**External Service Providers:** There may be separate services offered by third parties that we refer to as external service providers that may be complementary to your use of the Site. If you choose to use these separate services, disclose information to the external service providers, and/or grant them permission to collect information about you, then their use of your information is governed by their privacy policy. We do not disclose your personal information, including your email address, to external service providers unless you provide your explicit consent. With your consent we may provide some of your personal information to the external service provider offering such services, for your convenience. To prevent our disclosure of your personal information to an external service provider, you can decline such consent or simply not use their services or products. Because we do not control the privacy practices of these third parties, you should evaluate their practices before deciding to use their services.

**Internal Service Providers:** We may use third parties that we refer to as internal service providers to facilitate or outsource one or more aspects of the business, product and service operations that we provide to you and therefore we may provide some of your personal information, including your email address, directly to these internal service providers. These internal service providers are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information

we provide them for any other purpose except to facilitate the specific outsourced Simba Smile related operation, unless you have explicitly agreed or given your prior permission to them for additional uses. If you provide additional information to an internal service provider directly, then their use of your personal information is governed by their applicable privacy policy. Our internal service providers processing your personal information may be located in following countries: Kenya and Germany.

**Legal Requests:** Simba Smile cooperates with law enforcement inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights, to help protect you, other users, and Simba Smile from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorize us to) disclose your name, city, state, telephone number, email address, username history, and fraud complaints without a subpoena. Without limiting the above, in an effort to respect your privacy, we will not otherwise disclose your personal information to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss, or report suspected illegal activity.

Due to the existing regulatory environment, we cannot ensure that all of your private communications and other personal will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information, including your email address, to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your personal information that they collect from the Site. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should neither rely upon nor expect, that your personal information or private communications will always remain private.

## **6. Log Files**

As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyse trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically-collected data to personally identifiable information. We track trends in users' usage and volume statistics to create a more efficient and usable site and offerings, and to determine areas of the site or our services that could be improved to enhance the user and customer experience. Log files are used on the Site, and in any link to the Site from an email.

## **7. Cookies and Related Technologies**

When you use this Site, we collect certain information by automated or electronic means, using technologies such as cookies, browser analysis tools, and web server logs. As you use this Site, or our applications, your browser and other electronic devices communicate with servers operated by us and our services providers to coordinate and record the interactivity and fill your requests for services and information.

The information from cookies and related technology is stored in web server logs and also in web cookies kept on your computers or mobile devices, which are then transmitted back to this Site by your computers or mobile devices. These servers are operated, and the cookies managed by us or our service providers.

For example, when you visit this Site, Simba Smile and our service providers may place cookies on your computers or mobile devices. Cookies allow us to recognize you when you return, and track and target your interests in order to provide a customized experience. They also help us provide a customized

experience and help us to detect certain kinds of fraud. A “cookie” is a small amount of information that a web server sends to your browser that stores information about your account and preferences.

Some cookies are temporary, whereas others may be configured to last longer. “Session” cookies are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases session cookies once you exit your browser. “Persistent” cookies are more permanent cookies that are stored on your computers or mobile devices even beyond when you exit your browser. We use persistent cookies for a number of purposes, such as retrieving certain information you have previously provided, and storing your preferences.

## **8. Manage Your Security Settings**

You may manage how your browser handles cookies and related technologies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. You can opt-out of being targeted by certain third-party advertising companies online at [http://www.networkadvertising.org/consumer/opt\\_out.asp](http://www.networkadvertising.org/consumer/opt_out.asp) or <http://preferences.truste.com/truste/>.

You may manage how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

## **9. Links to Other Sites**

This Site may contain links to other sites that are not owned or controlled by Simba Smile. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies only to information collected by this Site.

## **10. Social Media**

You can find Simba Smile also in social media. Please check below what information about your activities in our social media platforms Simba Smile may collect. This information are used for statistical purposes and for improving content of our social media pages.

### **Facebook:**

Followers as total number by: country/language/age range/gender, interactions by profile name/post. Please read Privacy Policy of Facebook to receive more information.

### **LinkedIn:**

Followers as total number by: location/job function/seniority/company size/industry, Interactions by profile name/post. Please read Privacy Policy of LinkedIn to receive more information.

### **Twitter:**

Followers by profile, retweets by profile, total numbers by: interests/consumer buying styles/wireless carrier/household income categories/net worth/marital status/home ownership/TV genres/premium brands/consumer goods purchases, Demographics – region/country/language. Please read Privacy Policy of Twitter to receive more information.

### **YouTube:**

Subscribers by profile, total numbers by region/demographics/age range/country/gender, comments – by profile name, Likes as anonymous. Please read Privacy Policy of YouTube/Google to receive more information.

### **Instagram:**

Followers by profile, Likes and comments by profile, total numbers by location/age range/gender. Please read Privacy Policy of Instagram to receive more information.

Please notice. You have the opportunity to participate in discussions on social media platforms administered by Simba Smile. The goal of these social media platforms is to enable you to share content. Simba Smile is not responsible if you share data and personal information on social media platforms, and then these data will be used or misappropriated by other users or will be misused.

## **11. Your rights concerning processing of personal information**

You are at any time entitled to be informed of the personal information about you that we process, with certain legislative exceptions. You also have the right to object to the collection and further processing of your personal data. Furthermore, you have the right to have your personal data rectified, erased or blocked according to applicable laws, but please be informed that we cannot always delete records of past interactions and transactions. For example, it may be required to retain records relating to previous purchases for financial reporting and compliance reasons.

Moreover, you have the right to have the data that you have provided to Simba Smile issued to you or transmitted to another data controllers, if possible.

If you want us to update, amend or delete the personal data that we have recorded about you, if you wish to get access to the data being processed about you, or if you have any questions concerning the above guidelines, or if you wish to appeal against the processing of your personal data you may contact us at [simbasmile.ke@gmail.com](mailto:simbasmile.ke@gmail.com). You may also write to us at the following address: Simba Smile P.O. Box 20844 – 00200, Nairobi, Kenya.

Please notice that you have the right to lodge a complaint regarding processing of your personal information to data protection authority within your jurisdiction.

## **12. Transmission of the personal data to other countries.**

Simba Smile is headquartered in Nairobi, Kenya. Personal information may be accessed by us or transferred to us in Kenya or to our affiliates, business partners, or service providers located in: Germany. We will protect the privacy and security of personal information according to this Privacy Policy, regardless of where it is processed or stored.

## **13. Children Under the Age of 13**

The Site is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Site or on or through any of its features/register on the Site, make any purchases through the Site, use any of the interactive or public comment features of this Site or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [simbasmile.ke@gmail.com](mailto:simbasmile.ke@gmail.com).

## **14. Data Security**

We follow generally accepted industry standards to protect personal information both during transmission and once we receive it. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site. The information you share in public areas may be viewed by other users of the Site.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Site. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.