

Privacy Policy for Skillshot Limited

Effective Date: 27th November 2024

Last Updated: 27th November 2024

1. Introduction

Skillshot Limited ("we," "us," or "our") is committed to protecting the privacy and security of personal data collected from our clients, partners, employees, and website visitors. This Privacy Policy explains how we collect, use, store, and protect your personal information in compliance with the **Kenya Data Protection Act (KDPA), General Data Protection Regulation (GDPR), and applicable United States privacy laws** (such as the **California Consumer Privacy Act (CCPA)** and **Health Insurance Portability and Accountability Act (HIPAA), where applicable**).

By accessing our services, including training, consultancy, workforce solutions, and digital platforms, you agree to the collection and use of your information as outlined in this Privacy Policy.

2. Information We Collect

2.1 Personal Data Collected

We collect the following types of personal data depending on our relationship with you:

- **Identity Information** – Name, job title, employer, national ID or passport number.
- **Contact Information** – Email address, phone number, postal address.
- **Employment Data** – CVs, professional credentials, work experience, training records.
- **Financial Information** – Payment details for transactions related to our services.
- **Health Information (where applicable)** – When providing workforce placements in healthcare settings, we may collect relevant health information with explicit consent and in compliance with applicable laws.
- **Technical Data** – IP address, browser type, device information, website usage statistics.

2.2 How We Collect Data

- **Direct interactions** – When you register for our services, apply for a job, or contact us.
- **Automated technologies** – Through cookies and analytics tools when you visit our website.
- **Third parties** – Business partners, professional bodies, and publicly available sources.

3. Legal Basis for Processing (Applicable to GDPR & KDPA)

We process personal data based on the following legal grounds:

- **Performance of a Contract** – To provide requested services such as training and consultancy.
- **Legal Obligation** – To comply with national and international legal requirements.
- **Legitimate Interest** – To improve our services, marketing, and business operations.
- **Consent** – For marketing communications and processing sensitive personal data (where required).

4. How We Use Your Information

We use personal data to:

- Provide training, consultancy, and workforce placement services.
- Communicate with clients and respond to inquiries.
- Comply with legal and regulatory requirements.
- Conduct research and improve service offerings.
- Send marketing communications (with opt-out options).
- Prevent fraud and ensure security.

5. Data Sharing and Disclosure

We do not sell personal data. However, we may share data with:

- **Service Providers** – To facilitate payments, analytics, and technical support.
- **Regulatory Authorities** – To comply with legal and government requests.
- **International Transfers** – Data may be stored or processed outside your country of residence. We ensure adequate data protection measures such as Standard Contractual Clauses (SCCs) and compliance with **Kenya Data Protection Act, GDPR, and US Privacy Laws.**

6. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes outlined in this policy or as required by law. Retention periods vary based on legal, contractual, and operational requirements.

7. Data Security

We implement technical and organizational measures to protect data, including:

- Encryption and access control mechanisms.
- Secure cloud storage and data backups.
- Internal policies for data access restrictions.
- Regular security audits and compliance checks.

8. Your Rights

Under the Kenya Data Protection Act & GDPR:

- **Right to Access** – Request copies of your personal data.
- **Right to Rectification** – Correct inaccurate or incomplete data.
- **Right to Erasure (Right to Be Forgotten)** – Request deletion of data under certain conditions.
- **Right to Restrict Processing** – Limit how we use your data.
- **Right to Data Portability** – Request transfer of your data to another service provider.
- **Right to Object** – Object to processing for direct marketing or legitimate interests.

Under US Privacy Laws (CCPA & HIPAA, where applicable):

- **Right to Know** – Request details about data collected, sources, and third parties shared with.
- **Right to Opt-Out** – Prevent sale of personal data (we do not sell personal data).
- **Right to Non-Discrimination** – No penalties for exercising your privacy rights.

To exercise any of these rights, contact us at **[Insert Contact Email]**.

9. Cookies and Tracking Technologies

Our website uses cookies to enhance user experience. You may manage or disable cookies through your browser settings.

10. International Data Transfers

For users outside Kenya, we ensure data is transferred securely under recognised legal frameworks, including GDPR's adequacy decisions or SCCs.

11. Children's Privacy

Our services are not directed at children under 18, and we do not knowingly collect their data. If a parent or guardian believes their child has provided personal data, please contact us for removal.

12. Changes to This Privacy Policy

We may update this policy periodically. Any significant changes will be communicated via our website.

13. Contact Information

For inquiries or to exercise your privacy rights, contact:

Skillshot Limited

158, Shinyalu Close,

Kitisuru, Nairobi, Kenya.

Po. Box 16777-00100

Mpost: 0713337823

Telephone: +254717887823

Email: ClientCare@skillshot.co.ke

By using our services, you acknowledge and accept the terms of this Privacy Policy.
