

Privacy Policy

JOJO TECHNOLOGIES LTD

Effective Date: September 2026 Last Updated: September 2026

1. Introduction

JOJO TECHNOLOGIES LTD ("we," "us," or "our") is committed to protecting your personal data and respecting your privacy rights. This Privacy Policy explains how we collect, use, store, and protect your personal information when you visit our website (jojotech.co.ke), use our services, or interact with our platforms, including JOJO CONNECT.

This policy is prepared in compliance with the Data Protection Act, 2019 (Laws of Kenya) and the Data Protection (General) Regulations, 2021. By using our website or services, you consent to the practices described in this policy.

2. Who We Are

Detail	Information
Company Name	JOJO TECHNOLOGIES LTD
Business Type	Technology company
Country	Kenya
Website	https://jojotech.co.ke
Contact Email	legal@jojotech.co.ke
Data Controller	JOJO TECHNOLOGIES LTD

If you have any questions about this Privacy Policy or how we handle your data, please contact us at legal@jojotech.co.ke.

3. What Personal Data We Collect

We collect personal data that you voluntarily provide to us, as well as data collected automatically through your use of our services.

3.1 Data You Provide Directly

Contact Information: Name, email address, phone number, company name, job title

Account Information: Username, password (encrypted), account preferences

Business Information: Company details, project requirements, service inquiries

Payment Information: M-PESA transaction details, billing information (we do not store full payment card details)

Communications: Messages, feedback, support tickets sent to us

3.2 Data Collected Automatically

Technical Data: IP address, browser type, operating system, device information

Usage Data: Pages visited, time spent on site, click patterns, referral sources

Location Data: General geographic location derived from IP address

Cookies and Tracking: See Section 10 for our Cookie Policy

3.3 Data from Third Parties

M-PESA/Safaricom: Transaction confirmation details via the Daraja API

Analytics Providers: Aggregated usage data from Google Analytics or similar services

Social Media: Publicly available information if you interact with us on social platforms

4. How We Use Your Personal Data

We process your personal data for the following lawful purposes:

Purpose	Lawful Basis	Description
Service Delivery	Contract	To provide software development, connectivity solutions, and JOJO CONNECT services
Account Management	Contract	To create and manage your user account
Payment Processing	Contract	To process M-PESA payments and manage billing
Customer Support	Legitimate Interest	To respond to inquiries and resolve technical issues
Service Improvement	Legitimate Interest	To analyze usage patterns and improve our platforms
Marketing Communications	Consent	To send updates, newsletters, and promotional materials (only with your explicit consent)
Legal Compliance	Legal Obligation	To comply with applicable laws, regulations, and court orders
Security	Legitimate Interest	To detect and prevent fraud, unauthorized access, and security breaches

5. Legal Basis for Processing

Under the Data Protection Act, 2019, we process personal data based on the following lawful grounds:

Consent: Where you have given clear, specific, and informed consent (e.g., for marketing communications)

Contract: Where processing is necessary to fulfill a contract with you or take steps at your request before entering a contract

Legal Obligation: Where we are required to process data by law

Legitimate Interests: Where processing is necessary for our legitimate business interests, provided your rights and freedoms are not overridden

6. How We Share Your Personal Data

We do not sell your personal data. We may share your data with:

6.1 Service Providers

Third-party vendors who perform services on our behalf, including: - Cloud hosting providers (e.g., AWS, Azure, or local Kenyan data centers) - Payment processors (Safaricom M-PESA via Daraja API) - Analytics and monitoring services - Email and communication platforms

All service providers are contractually bound to protect your data and use it only for the purposes we specify.

6.2 Business Partners

With your consent, we may share data with: - Technology partners for integrated solutions - Subcontractors for network installation and maintenance

6.3 Legal and Regulatory Bodies

We may disclose personal data when required by: - The Office of the Data Protection Commissioner (ODPC) - Law enforcement agencies - Courts or regulatory authorities

6.4 Business Transfers

In the event of a merger, acquisition, or sale of assets, your data may be transferred to the acquiring entity, subject to the same privacy protections.

7. Data Security

We implement and continually review appropriate technical and organizational measures designed to protect Personal Data. Controls may include encryption in transit, access controls, administrative authentication, security assessments, incident response procedures, and staff awareness measures, proportionate to the Service and risk involved.

Encryption: All data in transit is protected using TLS/SSL encryption. Sensitive data at rest is encrypted.

Access Controls: Role-based access controls limit who can access personal data

Authentication: Multi-factor authentication for administrative access

Regular Audits: Periodic security assessments and vulnerability testing

Incident Response: Documented procedures for detecting, reporting, and responding to data breaches

Staff Training: Regular data protection training for all employees

In the event of a Personal Data breach, we will assess the incident and notify the Office of the Data Protection Commissioner and affected data subjects where and within the period required by applicable law.

8. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected:

Data Category	Retention Period
Account data	Duration of account + 2 years after closure
Transaction records	7 years from the relevant transaction, or longer where required by law
Marketing consents	Duration of consent or objection + 2 years
Support tickets	3 years after resolution
Website analytics	Not currently collected. If introduced, up to 26 months, then aggregated or anonymised.

After the retention period expires, personal data is securely deleted or anonymized.

9. Your Data Protection Rights

Under the Data Protection Act, 2019, you have the following rights:

9.1 Right to Access

You have the right to request a copy of the personal data we hold about you.

9.2 Right to Rectification

You have the right to request correction of inaccurate or incomplete personal data.

9.3 Right to Erasure ("Right to be Forgotten")

You have the right to request deletion of your personal data where: - The data is no longer necessary for the purposes collected - You withdraw consent and there is no other lawful basis - The data has been unlawfully processed - The data must be erased for legal compliance

9.4 Right to Restrict Processing

You have the right to request that we limit how we use your data in certain circumstances.

9.5 Right to Data Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transfer it to another controller.

9.6 Right to Object

You have the right to object to: - Processing based on legitimate interests - Direct marketing at any time - Automated decision-making and profiling

9.7 Right to Withdraw Consent

Where we rely on your consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal.

9.8 Right to Lodge a Complaint

If you believe we have violated your data protection rights, you may lodge a complaint with the Office of the Data Protection Commissioner (ODPC): - Website: <https://www.odpc.go.ke> - Email: info@odpc.go.ke

How to Exercise Your Rights

To exercise any of these rights, contact us at legal@jojotech.co.ke with: - Your full name and contact details - Description of the right you wish to exercise - Any supporting information

We will respond within 30 days of receiving your request. We may request proof of identity to verify your request.

10. Cookies and Tracking Technologies

10.1 What Are Cookies

Cookies are small text files stored on your device when you visit our website. They help us improve your experience and understand how our site is used.

10.2 Types of Cookies We Use

Cookie Type	Purpose	Duration
Essential	Only if required for security or a website function	Session / only as necessary
Analytics	Not currently used. Notice and appropriate choice will be provided before use.	If introduced, up to 26 months
Functionality	Not currently used on the public website.	If introduced, up to 1 year
Marketing	Not currently used. Consent will be obtained before use.	If introduced, up to 1 year

10.3 Managing Cookies

You can control cookies through your browser settings. Note that disabling essential cookies may affect website functionality.

10.4 Third-Party Cookies

We may use third-party analytics services (e.g., Google Analytics) that set their own cookies. These providers have their own privacy policies.

11. International Data Transfers

We primarily store and process personal data within Kenya. In limited circumstances, we may transfer data outside Kenya:

To cloud service providers with data centers in other jurisdictions

To international technology partners

Any such transfer will only occur where: - The recipient country has adequate data protection safeguards - Appropriate contractual safeguards are in place - You have given explicit consent (especially for sensitive personal data)

12. Children's Privacy

Our services are not directed at children under 18. We do not knowingly collect personal data from children. If you believe we have inadvertently collected data from a child, please contact us immediately at legal@jojotech.co.ke.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will: - Post the updated policy on this page - Update the "Last Updated" date at the top - Notify you of material changes via email or website notice

We encourage you to review this policy periodically.

14. Contact Us

For questions, concerns, or requests related to this Privacy Policy or your personal data:

Contact Method	Details
Email	legal@jojotech.co.ke
Phone	+254 714 508 921

Contact Method	Details
Address	Nairobi, Kenya
Data Protection Contact	legal@jojotech.co.ke

This Privacy Policy is effective as of September 2026 and complies with the Data Protection Act, 2019 (Laws of Kenya).