

EXTERNAL PRIVACY STATEMENT

ASSA ABLOY Group, including its Kenya subsidiary ASSA ABLOY (EA) LTD and our brands such as ABLOY, UNION, Mul-T-Lock, Yale and IDS are committed to protect your personal information.

This privacy notice describes:

- the types of personal information we collect from you;
- how we use that information and why;
- who we share it with and where;
- how long we store it for;
- your rights, including how you can contact us if you have additional questions about the processing of your personal information; and
- how we can make changes to this notice.

Please click on the links above to navigate directly to the relevant section of this privacy notice.

ASSA ABLOY (EA) LTD, Dunga Close, Off Dunga Road, Industrial Area, Nairobi, shall be responsible for data processing in the Kenyan jurisdiction.

For further information on our use of cookies, please see our Cookies policy.

What personal information will ASSA ABLOY process?

We collect and store:

- Your name, company name, country, email and/or telephone number which you submit (in order to sign-up for electronic direct marketing, request an expert consultation or other information from us).
- Contact and delivery details as well as financial information you submit (a) when registering your account with us (b) in connection with any requests for, or purchase of products.
- Any information you tender when making use of any of our websites.
- How you use our website(s) via the use of Google Analytics.
- In addition to the information you submit, we are gathering your IP address to serve you with geographically relevant content and personalisation purposes when making use of our website(s).
- Other information might also include:
 - date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and other financial information;
 - records of correspondence or enquiries from you or anyone acting on your behalf;
 - details of transactions you carry out with us;
 - details of contracts, sales or leases you carry out with us;
 - sensitive or special categories of personal information, including biometric information, such as images (CCTV), fingerprints and voiceprints when making use of any of our products or otherwise.

How and why will ASSA ABLOY use your personal information?

Why do we process this personal information?

What is the legal basis for such processing?

To provide you with the information you request via the website.

Using your personal information in this way is necessary for us to respond to your request.

To set up and manage your account, for example by sending you password reminders or notifications of changes to your account details.

Using your personal information in this way is necessary for us to provide you with an online account.

To allow you to access some of our social media platforms or services.	Using your personal information in this way is necessary for us to improve your online experience.
To fulfil your order where you have made a purchase from this website or otherwise, to provide you with products or services, and notifying you about important changes to these services, products or offerings; to contact you about sales and as a part of our customer relation procedures.	Using your personal information in this way is necessary for us to perform our contractual obligations where you have placed an order on this website.
To keep your payments safe and secure and protect the security of our website.	It is in our legitimate interests to process personal information to keep our customers' payments secure, prevent fraud and protect our website from cyber-attacks.
To carry out statistical analysis about the use of the website to better understand how our website is used and make improvements.	It is in our legitimate interest to look at this information to understand how our website is being used, and to manage and improve it. Since no sensitive personal information will be processed and the processing is limited, we have concluded that our legitimate interest to conduct the analysis and improvements takes precedence over your privacy interest.
To send you communications about relevant products or services which may be of interest, in accordance with your marketing preferences.	We will only send you marketing materials where we have your consent.
To offer you guided sales tools to assist you with selecting the correct product or service.	Using your personal information in this way is necessary for us to respond to your request.
To comply with legal, auditing, operational or recordkeeping requirements to which we are subject, such as tax or financial reporting requirements.	Using your personal information in this way is necessary for us to comply with our legal obligations.
To obtain services, products or offerings from you.	We process information to give effect to a contract between us for the supply of goods and services.
To detect and prevent fraud and money laundering and/or in the interest of security and crime prevention.	It is in our legitimate interests and in public interest to prevent fraud and other crimes.
To assess and deal with complaints and requests.	It is in our and your legitimate interests to ensure we deal adequately with complaints.
For operational, marketing, auditing, legal and record keeping requirements.	It is necessary to comply with legal obligations or in our legitimate interests to do so.
To verify your identity.	It is in our legitimate interests to know who we are dealing with.
To transfer or process your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites.	It is in our legitimate interests to use cloud storage, operate websites, transfer information to entities in our group and other services provides.
To comply with lawful requests for information received from local or foreign law enforcement, government and tax collection agencies.	It is mandatory to comply with obligations under local law and in the interests of foreign law enforcement and the like to comply with foreign laws.

To conduct market research and providing you with information about ASSA ABLOY's products or services from time to time via email, telephone or other means (for example, events).	It is in our legitimate interests in order to improve our offering.
To record and/or monitor your telephone calls and electronic communications to/with ASSA ABLOY in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention.	It is in our legitimate interests to have records of telephonic conversations for operational, recordkeeping and evidentiary purposes.
Where you have unsubscribed from certain direct marketing communications, to ensure that we do not send such direct marketing to you again.	We process this information to give effect to your right as data subject to opt out from direct marketing.
To disclose your personal information to third parties for reasons set out in this privacy notice or where it is not unlawful to do so.	It is in our legitimate interests or those of third parties to share information where it is lawful to do so.
To monitor, keep record of and having access to all forms of correspondence or communications received by or sent from ASSA ABLOY or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and ASSA ABLOY.	It is in our legitimate interests to have records of communications for operational, recordkeeping and evidentiary purposes.
To prevent and control of any disease.	It is in public interest and in your and our legitimate interests to do so.

How we collect information

You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application form for our products and services or requesting further information about our products and services, or by providing a quotation or tender, whether in writing, through our website, over the telephone or any other means.

Transfer of personal information

We may transfer your personal information for the purposes set out above:

- To other companies within the ASSA ABLOY Group (a full list of ASSA ABLOY entities can be found here, including to companies that market, sell and support our solutions in your country when you sign-up for an expert consultation or request information from us.
- To third parties who provide services connected to this website or its functions, but only to the extent necessary to provide these services, such as:
- IT (Information Technology) and marketing agency service providers who host, develop and offer support for this website.
- When required by law.

ASSA ABLOY uses standard contractual clauses approved by the European Commission (in terms of the European Union Data Protection Regulation ("GDPR") requirements), safeguards in terms of the South African Protection of Personal Information Act, 2013 ("POPIA") and/or other applicable data protection legislation ("Data Protection Laws") when transferring personal information transborder to ensure a sufficient level of protection.

We take measures to protect all personal information transferred to a third party, or to other countries, in accordance with Data Protection Laws.

For how long will ASSA ABLOY store your personal information?

We store personal information for as long as necessary to fulfil the purpose for which the data has been collected, and in accordance with our internal record retention schedule. This means that we delete your personal information when such data is no longer necessary to process a request or an order, or to manage your account or our client relationship. Statistics which have been anonymised may be saved for longer.

Your rights:

In relation to the personal information that we hold about you, you have the right to:

- Request a copy of your personal information from our records.
- Ask that we correct or erase your personal information (though this may mean that we cannot process requests or orders, or that your account expires).
- Ask us to stop processing your personal information (for example as regards the use of the data to improve our website), or restrict how we process it (for example if you deem the data to be incorrect).
- Request the personal information used to provide you with information you requested, process an order, or manage your account or our relationship in a machine-readable format, which you are entitled to transfer to another data controller; and
- Withdraw your consent to us processing your data for marketing purposes at any time, which can be performed by navigating towards the footer of any direct marketing e-mail and to follow the opt-out steps clearly indicated at a designated link.

We may not accept a request to erase your personal information where it is required to perform under a contractual arrangement, required to comply with a legal obligation or in relation to a legal claim.

Requests to exercise your rights should be addressed to Attn: ASSA ABLOY Information Officer at P.O. Box 42837-00100, Nairobi, Kenya or ke.info@assaabloy.com.

If you have a complaint regarding the processing of your personal information by ASSA ABLOY you are entitled to report such dissatisfaction to the Chief Financial Officer, the supervisory authority for the personal information processing of ASSA ABLOY, including the Information Regulator's **established under POPIA**.

How can we make changes to this privacy notice?

We may update this privacy notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes (including when they will take effect). Your continued use of the website after any such updates take effect will constitute acceptance of those changes. If you do not accept any updates to this privacy notice, you should stop using this website.

Disclaimer - All references to laws and regulations under foreign jurisdictions within this External Privacy Statement shall be deemed interpreted under Kenyan law. Specifically, references to the following enactments shall be understood within the context of the following laws of Kenya:

- Data Protection Act, 2019, Laws of Kenya;
- Data Protection (General) Regulations, 2021;
- The Data Protection (Registration of Data Controllers and Data Processors) Regulations, 2021;
- The Data Protection (Complaints Handling and Enforcement) Regulations, 2021;
- Data Protection (Civil Registration) Regulations, 2020; and
- All other applicable legislation

It is acknowledged and agreed that any rights, obligations, and interpretations related to data protection laws and regulations shall be governed by Kenyan law, and any disputes arising therefrom shall be subject to the jurisdiction of Kenyan courts. In witness whereof, the Parties hereto have acknowledged and agreed to this interpretation clause as part of this External Privacy Statement.