PERSONAL-DATA PROTECTION NOTICE

Privacy Policy

How Elimvia Limited handles information across the public website, Learning, institutional LMS services, applications, and support.

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> This policy explains the information we process, why we process it, when we act on an institution’s instructions, and how people can exercise their privacy rights.
>
> Mandatory legal rights take precedence. See the applicable order or institutional agreement where relevant.

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1. Scope, company and contact

Elimvia Limited operates the Elimvia website, Learning services and associated education software. This notice covers data processed through public pages, accounts, educational applications, contact channels and support, except to the extent an institutional agreement or specific product notice supplies additional details.

Privacy enquiries and rights requests may be sent to support@elimvia.com. This is a privacy notice, not a request for consent to all processing. Processing must have an appropriate legal basis regardless of whether a visitor has read the notice.

2. Who controls the information

For visitor enquiries, Elimvia-owned accounts, platform operations, billing, security and marketing choices, Elimvia Limited generally determines the purposes of processing and acts as a data controller.

For school-managed learner, staff and guardian records, the educational institution ordinarily determines why the records are collected and how authorised users may use them; Elimvia may act as a data processor under written instructions and applicable agreements. Roles may differ for particular purposes, so institutions should consult their service and data-processing terms.

3. Categories of personal data

Depending on features used, data can include:

- Identity and account data: names, contact details, school or instructor associations, roles, account identifiers and authentication events.
- Learning data: enrolments, assignment submissions, assessments, feedback, progress, certificates and instructor-generated content.
- Institutional records: admissions, attendance, class allocation, guardian contacts, authorised fee entries, staff administration and training records.
- Transactions: course or subscription orders, amounts, payment references, invoice history, refunds and payout information.
- Technical and security records: IP address, browser/app version, device identifiers where relevant, timestamps, logs and suspicious-activity alerts.
- Communications: support requests, contact forms, email exchanges and preferences, including WhatsApp communications you initiate.
- Sensitive or children’s data only when necessary, appropriately authorised and handled with safeguards relevant to the service and law.

4. Where data comes from

Information may come directly from a user, authorised instructor or institution administrator; from learner activity, authorised account or app operations; from contact forms; or from a payment service confirming a transaction.

Schools and guardians may supply data relating to learners or staff. The institution remains responsible for giving appropriate notices and establishing lawful collection authority when it controls those records.

5. Purposes and lawful grounds

We process personal data as necessary to deliver requested services, operate accounts, enable learning and administration, handle payments, provide support, prevent abuse and meet legal obligations. Depending on the processing, the lawful ground may be contract performance, a legal obligation, legitimate interests assessed against individuals’ rights, consent or another basis permitted by Kenyan law.

Optional marketing or analytics choices are handled separately from uses necessary to supply the service. Where consent is the basis, it should be specific and can be withdrawn without retroactively invalidating earlier lawful processing.

6. School, college and training records

Institution Data may include records of children and other vulnerable learners. The institution determines who can view, change or export records and should assign staff rights according to job responsibilities, use lawful collection processes and keep record entries accurate.

Elimvia processes such records to deliver the relevant LMS environment and related support on approved instructions, and it does not claim ownership over the institution's records. The institution must manage disclosures to parents, employers or regulators under its own legal duties.

7. Children's privacy and guardians

Elimvia supports education involving children. Processing a child's personal data requires particular care, including appropriate parental or guardian involvement or other lawful authorisation, age-appropriate transparency, data minimisation and protection of the child's best interests.

Schools should avoid uploading unnecessary sensitive information and should verify that authorised guardians and staff access only appropriate records. If you believe a child's data has been supplied without proper authority, contact us for review. We do not treat access to the public website as a blanket authorisation to process children's records.

8. Billing, payments and instructor earnings

We may record order details, currency, payment status, references, refunds, commissions and payout status to supply purchases, settle valid transactions, answer disputes and maintain accounting records.

Payment credentials may be processed by independent payment providers. We do not claim to store complete card numbers; the exact provider arrangement depends on the payment method. The platform's standard Learning instructor commission is described in the Terms of Service; the privacy rules apply equally to associated transaction records.

9. Who may receive information

Access or disclosure is limited to what is needed for authorised services or required by law. Recipients may include:

- Approved hosting, infrastructure, email, security, support and analytics service providers.
- Payment providers, banks or mobile money operators necessary to process or investigate a transaction.
- An institution's designated administrators, educators and guardians where its access rules permit.
- An instructor and enrolled learner where sharing is necessary for the purchased educational activity.
- Competent authorities, courts or regulators where a valid legal requirement applies.
- Professional advisers bound by suitable duties of confidentiality when necessary.

10. No sale of personal information

Elimvia's existing stated policy is not to sell or rent users' personal information. Sharing required for platform operation, delivery, authorised institution use or legal compliance is distinct from selling data.

If the company proposes a materially different use of personal data, it must establish a lawful basis and provide appropriate notice before that use.

11. International hosting and data transfers

Technology providers may process or store data in more than one country. Where personal data is transferred outside Kenya, Elimvia and the relevant institution must apply legally required safeguards, checks or permissions under Kenyan law.

This policy does not claim that every database or backup is located in Kenya. Institutions needing data-residency commitments should obtain them through the relevant written service or processing agreement.

12. Retention, account closure and deletion

We retain categories of personal data only while reasonably necessary for the stated purpose, active service, security, an applicable institution instruction or a legitimate legal or accounting retention requirement. Actual periods depend on record type, contract and law, and are not identical for every product.

When an account closes, some records may be deleted or anonymised, while records required for tax, financial disputes, security or legitimate institutional archives may remain for an applicable period. Institutions can request the available export and offboarding arrangements under their agreements. Backups may be removed on their normal rotation cycle.

13. Security and incident response

We aim to use appropriate technical and organisational measures, which may include encrypted connections, controlled roles, logging, restricted infrastructure access and backups. No online system is completely risk-free; users and institutions must also protect accounts and devices.

If we identify an incident affecting personal data, we will investigate, contain and make notifications or cooperate with the relevant institution and regulator where required by applicable law. Please report suspected security issues promptly to support@elimvia.com.

14. Your data-protection rights

Subject to the Data Protection Act, 2019 and other applicable law, individuals may have rights to be informed, access personal data, object to certain processing, request correction of inaccurate data and seek deletion of data where legally justified. Other rights or remedies may apply to the particular processing.

Send requests to support@elimvia.com with enough information to identify the relevant account or institution; do not email passwords or unnecessary identity documents. We may verify your authority before acting. For institution-controlled records, we may refer the request to the responsible institution and assist it under our agreement.

15. Cookies, local storage and analytics

The public Elimvia website uses necessary local storage or cookies for functionality and records the visitor's analytics preference. Google Analytics is optional and should load only when the visitor selects "Allow Analytics." Choosing "Necessary Only" should prevent the public landing site's Google Analytics tracker from being loaded.

Visitors can change this setting using "Cookie Preferences" in the footer. Other Learning and LMS applications may have their own authentication cookies and additional notices; necessary security or session storage may remain active to deliver an account service.

16. Communications, contact forms and WhatsApp

When you send an enquiry, we use the supplied name, contact details and message to respond, route support and keep an appropriate enquiry record. The contact form may email the Elimvia inbox and send an acknowledgement to the sender.

A WhatsApp button opens an external service; messages you send there are subject to WhatsApp's applicable terms and privacy practices as well as our handling of the resulting enquiry. We do not infer consent to unrelated marketing from a support request.

17. Recommendations and automated processing

Software may apply automated sorting, course recommendations, progress calculations, reports or fraud-prevention checks. Such outputs are decision-support tools unless a particular product states otherwise.

Where an automated decision has legal or similarly significant consequences, applicable human-review, transparency and objection rights must be respected. Educational grading or promotion decisions remain the responsibility of the authorised institution or educator.

18. Changes and how to contact us

We may update this notice when products, service providers, law or actual data handling change. The published effective date will be updated and material changes communicated as required.

Privacy and data-rights requests: support@elimvia.com • Elimvia Limited, Kenya • Website: https://elimvia.com. Individuals also have the right to use eligible complaint channels with the Office of the Data Protection Commissioner (https://www.odpc.go.ke).

Related policies and support: Terms • Privacy • Refunds • support@elimvia.com