

# PRIVACY POLICY

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TradersKE ('we', 'us', 'our') is committed to protecting your personal information. This Privacy Policy explains what data we collect, how we use it, and your rights regarding your information when you use our Services.

## 1. INFORMATION WE COLLECT

### 1.1 Information You Provide Directly

- Full name and contact details (email, phone number) when booking sessions or registering for events
- Payment information — we do not store full M-Pesa transaction data; we only record transaction references
- HFM account numbers provided for free event verification
- Survey responses submitted through our website
- Messages and correspondence sent to us via WhatsApp, email, or our website

### 1.2 Information Collected Automatically

- Website usage data via Google Analytics (pages visited, session duration, device type)
- IP address and approximate geographic location
- Browser type and operating system
- Referral source (how you found our website)
- Cookie data (see Cookie Policy section)

### 1.3 Information from Third Parties

- Data shared when you interact with our Telegram, WhatsApp, or Discord channels
- Information provided by HFM when verifying account eligibility for events

## 2. HOW WE USE YOUR INFORMATION

We use the information we collect to:

- Process bookings, payments, and event registrations
- Confirm coaching sessions and send Zoom meeting links
- Verify eligibility for free events (HFM account check)
- Send transactional notifications about your purchases or bookings
- Respond to your enquiries and provide customer support
- Improve our website, content, and services based on usage analytics
- Send community announcements
- Prevent fraud and ensure the security of our Services
- Comply with legal obligations

## 3. LEGAL BASIS FOR PROCESSING (GDPR / Kenyan Data Protection Act)

We process your personal data under the following legal bases:

- Contract Performance: processing necessary to fulfil your booking, event registration, or purchase
- Legitimate Interest: analytics to improve our services, fraud prevention, community management
- Consent: marketing communications and non-essential cookies (you may withdraw consent at any time)
- Legal Obligation: where required by Kenyan law or regulatory authorities

## 4. HOW WE SHARE YOUR INFORMATION

We do not sell your personal information to third parties. We may share your data only in the following limited circumstances:

- Service Providers: Google (Analytics, Workspace), EmailJS (transactional emails), and Cloudflare (Infrastructure)—all bound by data processing agreements
- Payment Processing: M-Pesa transaction data is processed by Safaricom; we only receive confirmation references
- Event Partners: HFM account verification data shared solely for event eligibility purposes
- Legal Requirements: where required by court order, law enforcement, or applicable Kenyan law
- Business Transfer: in the event of a merger or acquisition, your data may be transferred with appropriate safeguards

## 5. DATA RETENTION

We retain your personal data only as long as necessary for the purposes outlined in this policy:

- Booking and payment records: 7 years (Kenyan tax and business records requirements)
- Event registration data: 2 years
- Survey responses: 1 year or until you request deletion
- Website analytics: aggregated data retained indefinitely; individual session data 26 months
- Marketing communications consent records: until you withdraw consent plus 1 year

## 6. YOUR RIGHTS

Under the Kenya Data Protection Act 2019 and applicable privacy law, you have the following rights regarding your personal data:

- Right of Access: request a copy of the personal data we hold about you
- Right to Rectification: request correction of inaccurate or incomplete data
- Right to Erasure: request deletion of your data in certain circumstances
- Right to Restrict Processing: request that we limit how we use your data
- Right to Data Portability: receive your data in a machine-readable format
- Right to Object: object to processing based on legitimate interests
- Right to Withdraw Consent: withdraw consent for marketing at any time

To exercise any of these rights, contact us at [info@traderske.com](mailto:info@traderske.com). We will respond within 30 days.

## 7. DATA SECURITY

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or destruction. These measures include SSL/HTTPS encryption, secure email handling via Spacemail, encrypted secrets for API integrations, and restricted access to sensitive data. **HOWEVER, NO INTERNET TRANSMISSION IS 100% SECURE AND WE CANNOT GUARANTEE ABSOLUTE SECURITY.**

## 8. COOKIES

We use cookies and similar tracking technologies on our website. You can manage cookie preferences through your browser settings.

This Cookie Policy explains how TradersKE uses cookies and similar tracking technologies on our website at [www.traderske.com](http://www.traderske.com). By using our website, you consent to the use of cookies as described in this policy.

### 8.1 WHAT ARE COOKIES?

Cookies are small text files placed on your device when you visit a website. They help websites function correctly, remember your preferences, and provide analytics data to website owners. Cookies can be 'session cookies' (deleted when you close your browser) or 'persistent cookies' (remaining on your device for a set period or until deleted).

### 8.2. COOKIES WE USE

#### 8.2.1 Essential Cookies

These cookies are strictly necessary for our website to function. They cannot be disabled without affecting core website functionality.

- Theme preference (dark/light mode): stores your display preference locally
- Survey completion status: prevents the survey popup from appearing repeatedly
- Event spot tracking: stores local registration data to prevent duplicate bookings

#### 8.2.2 Analytics Cookies

We use Google Analytics (GA4) to understand how visitors interact with our website. These cookies collect anonymised data including pages visited, time spent on pages, and traffic sources.

- `_ga`: Google Analytics identifier — expires after 2 years
- `_ga_XXXXXXX`: Google Analytics session state — expires after 2 years
- These cookies do not collect personally identifiable information

#### 8.2.3 Third-Party Cookies

Our website embeds content from third-party services that may set their own cookies:

- TradingView: ticker tape widget and chart embed may set functional cookies
- YouTube: embedded videos may set cookies when you interact with them

These third-party services have their own cookie and privacy policies which we encourage you to review.

### 8.3. MANAGING COOKIES

You can control cookies through:

- Browser Settings: most browsers allow you to view, delete, and block cookies. Refer to your browser's help section for instructions
- Google Analytics Opt-Out: install the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout>
- Local Storage: our theme survey preferences are stored in browser local storage. You can clear this through your browser's developer tools

Note that disabling certain cookies may affect the functionality of our website, including display preferences and proper form operation.

### 8.4. DO NOT TRACK

Some browsers include a 'Do Not Track' (DNT) feature. Our website does not currently respond to DNT signals; however, we minimise data collection to only what is necessary for our legitimate business purposes.

### 8.5. UPDATES TO THIS POLICY

We may update this Cookie Policy periodically. We will post changes on this page with an updated effective date. Please visit [www.traderske.com](http://www.traderske.com) regularly to stay informed.

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## 9. CHILDREN'S PRIVACY

Our Services are not directed at persons under the age of 18. We do not knowingly collect personal data from children. If you believe a child has provided us with personal information, please contact us immediately and we will take steps to delete such information.

## 10. INTERNATIONAL DATA TRANSFERS

Your data may be processed by service providers located outside Kenya (including the United States and European Union via Google and Cloudflare). We ensure appropriate safeguards are in place for such transfers in accordance with the Kenya Data Protection Act 2019.

## 11. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. We will notify you of significant changes by posting a notice on our website. Your continued use of our Services after changes are posted constitutes acceptance of the updated policy.

## 12. CONTACT — DATA CONTROLLER

TradersKE acts as the data controller for your personal information.

Email: [info@traderske.com](mailto:info@traderske.com)

Website: [www.traderske.com](http://www.traderske.com)

WhatsApp: +254 140 722 272

READ CAREFULLY BEFORE USING TRADERSKE SERVICES