

CUSTOMER PRIVACY NOTICE

How Perk Group Africa Limited collects and uses the personal data of its internet customers

Document reference	PGA/DP/03	Version	1.0
Owner	Director	Approved by	Board of Directors
Effective date	5th. January.2026	Next review	12 months from effective date

1. Who we are

Perk Group Africa Limited is a licensed internet service provider in Kenya. We are the data controller responsible for the personal data described in this notice. You can reach us at Muguku Business Centre, 4th Floor, Suite J4, Kikuyu, or by email at info@perk-gafrica.com, or by telephone on +254 712 028 449.

2. What personal data we collect

Category	Examples
Account information	Your name, account number, telephone number, email address, and the physical address and location coordinates of your installation
Service information	Your service package, billing type, connection and disconnection dates, and account status
Payment information	Mobile money transaction references and amounts, the telephone number used to pay, invoices, receipts and payment history
Technical information	Device MAC address, assigned IP address, network username, session start and stop times, data volumes used, and the identity of the equipment serving your connection
Support information	Records of your support requests, complaints, calls and messages with us

If you use one of our public hotspots, we collect the telephone number you enter, your payment reference, your device identifier and your session records. We do not monitor or record the content of your communications or the websites you visit, other than as required to operate and secure the network or as required by law.

3. How we collect it

We collect personal data directly from you when you apply for a service, make a payment, log in to a hotspot, or contact us for support. We also generate technical data automatically as your connection is used, and we may receive payment confirmations from mobile money providers.

4. Why we use it and our lawful basis

Purpose	Lawful basis	Data used
Registering you, activating your service and configuring the network	Performance of a contract	Account, service, technical
Billing you, collecting payment and reconciling accounts	Performance of a contract	Account, payment
Measuring your usage and applying your package limits	Performance of a contract	Technical
Providing support, resolving faults and handling complaints	Performance of a contract	Account, support
Securing the network, preventing fraud and investigating abuse	Legitimate interests	Technical, payment
Monitoring service quality and planning network capacity	Legitimate interests	Technical
Recovering unpaid amounts	Legitimate interests	Account, payment
Sending you offers and service promotions	Consent	Account
Meeting our tax, licensing and regulatory obligations	Legal obligation	Account, payment
Responding to lawful requests from competent authorities	Legal obligation	All categories

5. Who we share it with

We share personal data only where necessary, and only with:

- mobile money and payment providers, in order to process your payments;
- our messaging provider, in order to send you service messages and access codes;
- suppliers who provide our billing, network management and customer support systems, under written agreements that restrict them to acting on our instructions;
- our auditors, bankers and professional advisers, where necessary;
- the Communications Authority of Kenya, the Kenya Revenue Authority and other authorities, where we are required by law; and
- law enforcement agencies, where we receive a lawful request.

We do not sell your personal data.

6. Transfers outside Kenya

Some of the systems we use to run our business are operated by suppliers whose infrastructure is located outside Kenya, including in the United States and in Europe. Where personal data is transferred outside Kenya, we do so only where appropriate safeguards are in place as required by sections 48 and 49 of the Data Protection Act, or on another lawful ground. You may ask us for details of the safeguards that apply.

7. How long we keep it

We keep your account, billing and payment records for seven (7) years after your service ends, in order to meet tax and legal requirements. Technical session records are kept for twelve (12) months. Support records are kept for three (3) years. Fuller details are set out in our Data Retention and Disposal Schedule, a copy of which is available on request.

8. Your rights

Under the Data Protection Act, No. 24 of 2019, you have the right to be informed of how your personal data is used; to access the personal data we hold about you; to object to our processing of all or part of your personal data; to have false or misleading data corrected; and to have false or misleading data deleted. Where we rely on your consent, you may withdraw it at any time.

To exercise any of these rights, contact us at info@perk-gafrica.com. We will respond within seven (7) days. We may ask you to confirm your identity before we act on a request. There is no charge for making a request.

9. Complaints

If you are unhappy with how we have handled your personal data, please contact us first so that we can try to put it right. You also have the right to lodge a complaint with the Office of the Data Protection Commissioner.

10. Changes to this notice

We may update this notice from time to time. The current version is available on request and at our offices, and material changes will be notified to you.

Last updated:

DOCUMENT APPROVAL

Customer Privacy Notice

Reference: PGA/DP/03

Approved for issue for and on behalf of the Board of Directors of
Perk Group Africa Limited.



Signature: _____

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Designation: Director

Date signed: 11th September 2026

Effective date: 5th January 2026