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United Winners Sacco

COOKIES POLICY

Version: 1.0

Last Updated: June 21, 2025

1. Introduction

UWS Sacco (hereinafter referred to as "we," "us," or "our") is committed to protecting your privacy and ensuring a transparent online experience in compliance with the Data Protection Act, 2019 of Kenya. This Cookie Policy explains what cookies are, how we use them on our website [www.uwssacco.co.ke], and how you can manage your cookie preferences.

By continuing to use our website after being presented with our cookie consent banner and making your choices, you consent to the use of cookies in accordance with this policy. If you do not agree to our use of cookies, please adjust your preferences as detailed in Section 5, or refrain from using our website.

2. What are Cookies?

Cookies are small text files that are stored on your computer or mobile device when you visit a website. They contain information about your Browse activity and are used to remember your preferences, enhance your user experience, and analyze website performance. Cookies can be "persistent" (remaining on your device for a set period or until you delete them) or "session" (deleted as soon as you close your web browser).

Under the Data Protection Act, 2019, many cookies, particularly those that collect online identifiers like IP addresses or unique device IDs, are considered personal data. Our use of such cookies is therefore subject to the principles and obligations outlined in the DPA.

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3. How We Use Cookies and Why

We use cookies for various specific and legitimate purposes to improve your experience on the UWS Sacco website:

- Essential/Strictly Necessary Cookies:
  - Purpose: These cookies are fundamental for the website to function correctly. They enable core functionalities such as secure logins, maintaining your session as you navigate the site, and facilitating essential transactions. Our website cannot operate properly without these cookies.
  - DPA Compliance: Your explicit consent is generally *not* required for these cookies as they are necessary for the provision of the online service you have specifically requested (e.g., logging into your account). They are crucial for the performance of a contract or steps taken at your request before entering a contract.
  - Data Collected: Session IDs, security tokens.
- Analytical/Performance Cookies:
  - Purpose: These cookies collect anonymous and aggregated information about how visitors use our website, such as which pages are visited most often, the time spent on the site, and if users encounter error messages. This data helps us understand website performance, identify areas for improvement, and optimize your Browse experience.
  - DPA Compliance: We use aggregated and anonymized data from these cookies and do not use them to directly identify individual users. However, since they may still collect online identifiers, your **explicit consent** is required for these cookies.
  - Data Collected: Number of visitors, popular pages, navigation paths, browser type, device type (all typically anonymized or pseudonymized).
  - Example Third-Parties: Google Analytics.
- Functionality Cookies:
  - Purpose: These cookies allow our website to remember choices you make (e.g., your preferred language, region, or previously entered information in forms) and provide enhanced, more personalized features.
  - DPA Compliance: Your **explicit consent** is required for these cookies as they enhance user experience beyond basic functionality and may store preferences linked to an online identifier.
  - Data Collected: Language preferences, region, form data recall.

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- Targeting/Advertising Cookies:
  - Purpose: These cookies are used to deliver advertisements more relevant to you and your interests, both on our website and on other sites you visit. They are also used to limit the number of times you see an advertisement and help measure the effectiveness of advertising campaigns. They may build a profile of your interests.
  - DPA Compliance: These cookies collect significant personal data for profiling and marketing. Your explicit, specific, and informed consent is strictly required for these cookies. We will only place these cookies if you actively opt-in.
  - Data Collected: Browse history, interests, and demographics (for targeted ads).
  - Example Third-Parties: [List specific advertising platforms if you use them, e.g., Google Ads, Facebook Pixel.

4. Third-Party Cookies

In addition to our own cookies (first-party cookies), we may also use various third-party cookies on our website. These cookies are set by domains other than [www.uwssacco.co.ke] (e.g., by partners providing analytics or advertising services).

- Examples of third-party services that may set cookies on our website include:
  - Google Analytics: For website analytics and performance measurement.
  - Social Media Plugins: (e.g., Facebook, Twitter, LinkedIn) for sharing content or integrating social media features.
  - Embedded Content: (e.g., YouTube or Vimeo videos, Google Maps) which may set cookies as part of their service.

Please note that we have no direct control over third-party cookies or the data they collect. The third-party providers are solely responsible for their own cookie policies and data processing practices.

We strongly encourage you to review their respective privacy and cookie policies for more detailed information and to understand your rights concerning data collected by them.

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5. Your Cookie Choices and Management (Consent Management)

The Data Protection Act, 2019, grants you significant control over your personal data. We provide a clear mechanism for you to manage your cookie preferences:

- Cookie Consent Banner/Pop-up: Upon your first visit to our website, a prominent cookie consent banner or pop-up will appear. This banner will provide you with the following options:
    - "Accept All Cookies": By clicking this, you consent to all categories of cookies described in this policy, including essential, analytical, functionality, and targeting cookies.
    - "Reject All Non-Essential Cookies" / "Decline": By clicking this, only essential cookies will be placed on your device. All analytical, functionality, and targeting cookies will be blocked.
    - "Manage Preferences" / "Customise Cookies": This option will take you to a detailed preference center where you can select or deselect specific categories of non-essential cookies (e.g., allow analytics but block advertising cookies). Essential cookies cannot be deselected.
- Withdrawing Consent: You can easily withdraw your consent for non-essential cookies at any time by revisiting your cookie preferences. This can typically be done by clicking on a "Cookie Settings" or "Cookie Preferences" link, often found in the footer of our website. Your updated preferences will take effect immediately.
- Browser Settings: You can also configure your web browser to refuse all cookies or to indicate when a cookie is being sent. However, if you disable all cookies, some

parts of our website may not function correctly or may limit your access to certain features. This method of management applies universally to all websites you visit, not just ours.

6. Your Rights under the Data Protection Act, 2019

As a data subject under the Data Protection Act, 2019 of Kenya, you have specific rights concerning your personal data, including data collected through cookies. These rights include:

- Right to be informed: The right to be informed about the collection and use of your personal data. (Addressed by this policy and our Privacy Policy).
- Right of access: The right to request a copy of the personal data we hold about you.

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- **Right to rectification:** The right to request that we correct any inaccurate or incomplete personal data.
- **Right to erasure (right to be forgotten):** The right to request the deletion of your personal data under certain circumstances.
- **Right to object:** The right to object to the processing of your personal data, including for direct marketing purposes or where processing is based on legitimate interests.
- **Right to data portability:** The right to receive your personal data in a structured, commonly used, and machine-readable format.

For more detailed information about how we collect, use, store, and protect your personal data, and to understand how to exercise your rights, please refer to our comprehensive **Privacy Policy** available at [Link to UWS Sacco Privacy Policy].

7. Changes to this Cookie Policy

We may update our Cookie Policy from time to time to reflect changes in our practices, technology, or relevant laws, particularly the Data Protection Act, 2019 and its regulations. We will notify you of any significant changes by posting the new Cookie Policy on this page and updating the "Last Updated" date. We encourage you to review this Cookie Policy periodically for any changes.

8. Contact Us

If you have any questions or concerns about our use of cookies, this Cookie Policy, or to exercise your data protection rights, please contact us:

UWS Sacco

Headquarters Office: Imani Towers, 4th Floor, PCEA Umoja Church, Nairobi, Kenya.

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Phone: +254 709 453 115

Website: www.uws.co.ke

Review Date: Annually, or as needed due to changes in technology, threats, or regulations.