

# Privacy Policy

Tembo Circle (“Tembo”) – owner of Tusker Club® – here hereby wishes to inform you and to abide by data protection principles, in compliance with the General Data Protection Regulation (GDPR). This Data Protection Policy may be amended and shall be read in light of applicable laws and guidance from European Data Protection Board (EDPB) and the French Data Protection Authority (CNIL).

## Which personal data does Tembo process?

**Personal data types:** Collected and processed by Tembo may include names, emails, phone numbers, addresses and locations, academic background, professional experience and qualifications, questions and needs submitted to Tembo, missions and evaluations.

**Personal data sources:** Most personal data stem from your voluntary submissions to Tembo; others may be collected from publicly available information about you, or lawfully from partners or third parties.

## What are your rights?

You have the right to be informed, to seek access, rectification, limitation, or deletion of your personal data. You also have the right to obtain your personal data, in a readable format, for portability purposes.

Any request to exercising your rights shall be addressed to [concierge@tuskerclub.com](mailto:concierge@tuskerclub.com).

Requests shall be addressed in a timely fashion. Exceptionally, requests may not be satisfied in the event (i) Tembo is subject to legal obligations commanding otherwise or (ii) they entail unreasonable efforts or costs for Tembo.

## How does Tembo protect personal data?

Tembo protects personal data through the following technical and organizational measures:

**Minimization.** Personal data being processed are proportionate and limited to meeting their very purpose(s) and ground(s). Tembo may further minimize exposure by anonymizing or aggregating data for e.g., statistical, communication, research or reporting purposes.

**Accuracy.** Tembo endeavors to keep personal data accurate and updated provided you are keeping Tembo informed of any changes applicable to yours.

**Security.** Tembo makes reasonable efforts to ensure the security of personal data and their processing, such as limiting access and processing to duly authorized people and minimizing accidental loss or leaks. Back-up and deletion processes are put in place. Further, Tembo makes best effort to safeguard that all personal data are hosted within the European Union.

**Accountability.** Tembo keeps its Data Protection Policy updated, together with a registry of the categories of personal data processing.

**Breach.** In the event of a breach or incident (e.g., accidental, or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data), TEMBO shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the CNIL and to affected people in case the breach affects them and cannot be remedied.

**Why and for how long may Tembo process personal data?**

<p style="text-align: center;"><b>Grounds &amp; purposes</b></p> <p style="text-align: center;">Personal data processing by Tembo is based on the following</p>	<p style="text-align: center;"><b>Duration &amp; retention</b></p> <p style="text-align: center;">Tembo retains personal data for a limited time, as per their ground(s)</p>
<p><b>Legitimate interest:</b> If you contact Tembo, personal data processing is based on Tembo’s legitimate interest in answering your inquiries.</p>	<p>Retention for as long as such interest remains valid and legitimate.</p>
<p><b>Contract:</b> If you enter into an agreement with Tembo, personal data processing is based on meeting such contractual obligations.</p>	<p>Retention for as long as needed to meet such contractual obligations + 3 years to stay in contact.</p>
<p><b>Consent:</b> If you consent explicitly to certain processing purposes, personal data processing is based on such consent.</p>	<p>Retention for as long as consent is not revoked, or deletion is not requested, or once the purpose for which consent was given disappears.</p>
<p><b>Law:</b> Tembo may also process personal data to meet legal requirements (e.g., tax, accountancy).</p>	<p>Retention most often for 2 to 10 years, depending on the law at hand.</p>

**END OF POLICY**

Last updated: 30 September 2021