IATF 16949: 2016 /ISO 9001:2015/ISO 14001: 2015
Integrated Management Systems
Privacy Policy
ABM-IT-PP-POL-009

		Signature	Date
Prepared by:	Network & Infrastructure Specialist		25/09/2026
Reviewed by:	Group IT Manager		01/10/2026
Approved by:	Group Managing Director		1/10/26
Issue/ Rev	1/05	Next review	On or before 23.09.2028


Quality Our Commitment
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Quality Our Statement * Associated Battery Manufacturers * CONTROLLED DOCUMENT

1. INTRODUCTION

We respect your privacy and are committed to protecting it through our compliance with this privacy policy. This Policy describes the types of information we may collect from you or that you may provide ("Personal Information") on the ABM Group of company's websites ("Website" or "Service") and any of its related products and services (collectively, "Services"), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information.

It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

2. PURPOSE.

The purpose of this policy is to ensure user understands the requirements and what may be required in order to access and use the website and services.

3. SCOPE

This Policy is a legally binding agreement between you ("User", "you" or "your") and this Website operator ("Operator", "we", "us" or "our"). If you are entering into this agreement on behalf of a business or other legal entity, you represent that you have the authority to bind such entity to this agreement, in which case the terms "User", "you" or "your" shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this agreement, you must not accept this agreement and may not access and use the Website and Services. By accessing and using the Website and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

4. REFERENCES

4.1. ISO 27001:2013 Information Security Standard Requirements
4.2. Data Protection Act 2019

5. COLLECTION OF PERSONAL INFORMATION

You can access and use the Website and Services without telling us who you are or revealing any information by which someone could identify you as a specific, identifiable individual. If, however, you wish to use some of the features offered on the Website, you may be asked to provide certain Personal Information (for example, your name and e-mail address).

We receive and store any information you knowingly provide to us when you fill any forms on the Website. When required, this information may include the following:

- Contact information (such as email address, phone number, etc.)
- Basic personal information (such as name, country of residence, etc.)
- Geolocation data of your device (such as latitude and longitude)

Some of the information we collect is directly from you via the Website and Services. However, we may also collect Personal Information about you from other sources such as public databases and our joint marketing partners.

You can choose not to provide us with your Personal Information, but then you may not be able to take advantage of some of the features on the Website. Users who are uncertain about what information is mandatory are welcome to contact us.

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6. PRIVACY OF CHILDREN

We do not knowingly collect any Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information through the Website and Services. If you have reason to believe that a child under the age of 18 has provided Personal Information to us through the Website and Services, please contact us to request that we delete that child's Personal Information from our Services.

We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Website and Services without their permission. We also ask that all parents and legal guardians overseeing the care of children take the necessary precautions to ensure that their children are instructed to never give out Personal Information when online without their permission.

7. USE AND PROCESSING OF COLLECTED INFORMATION

We act as a data controller and a data processor when handling Personal Information, unless we have entered into a data processing agreement with you in which case you would be the data controller and we would be the data processor.

Our role may also differ depending on the specific situation involving Personal Information. We act in the capacity of a data controller when we ask you to submit your Personal Information that is necessary to ensure your access and use of the Website and Services. In such instances, we are a data controller because we determine the purposes and means of the processing of Personal Information.

We act in the capacity of a data processor in situations when you submit Personal Information through the Website and Services. We do not own, control, or make decisions about the submitted Personal Information, and such Personal Information is processed only in accordance with your instructions. In such instances, the User providing Personal Information acts as a data controller.

In order to make the Website and Services available to you, or to meet a legal obligation, we may need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services.

Any of the information we collect from you may be used for the following purposes:

- Send product and service updates
- Improve user experience
- Run and operate the Website and Services

Processing your Personal Information depends on how you interact with the Website and Services, where you are located in the world and if one of the following applies:

(i) You have given your consent for one or more specific purposes;

(ii) Provision of information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof;

(iii) Processing is necessary for compliance with a legal obligation to which you are subject;

(iv) Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us;

(v) Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

Note 1: Under some legislations we may be allowed to process information until you object to such processing by opting out, without having to rely on consent or any other of the legal bases.

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In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

8. DISCLOSURE OF INFORMATION

Depending on the requested Services or as necessary to complete any transaction or provide any Service you have requested, we may share your information with our affiliates, contracted companies, and service providers (collectively, "Service Providers") we rely upon to assist in the operation of the Website and Services available to you and whose privacy policies are consistent with ours or who agrees to abide by our policies with respect to Personal Information. We will not share any personally identifiable information with third parties and will not share any information with unaffiliated third parties.

Service Providers are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements.

Service Providers are given the information they need only in order to perform their designated functions, and we do not authorize them to use or disclose any of the provided information for their own marketing or other purposes.

9. RETENTION OF INFORMATION

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, to enforce our agreements, resolve disputes, and unless a longer retention period is required or permitted by law.

We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

10. DO NOT TRACK SIGNALS

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, the Website and Services are not yet set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described in more detail throughout this Policy, we limit our use and collection of your Personal Information.

11. SOCIAL MEDIA FEATURES

Our Website and Services may include social media features, such as the Facebook and Twitter buttons, Share This button, etc. (collectively, "Social Media Features"). These Social Media Features may collect your IP address, what page you are visiting on our Website and Services, and may set a cookie to enable Social Media Features to function properly. Social Media Features are hosted either by their respective providers or directly on our Website and Services. Your interactions with these Social Media Features are governed by the privacy policy of their respective providers.

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12. LINKS TO OTHER RESOURCES

The Website and Services contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave the Website and Services and to read the privacy statements of each and every resource that may collect Personal Information.

13. INFORMATION SECURITY

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in our control and custody. However, no data transmission over the Internet or wireless network can be guaranteed.

Therefore, while we strive to protect your Personal Information, you acknowledge that: (i) There are security and privacy limitations of the Internet which are beyond our control;

(ii) The security, integrity, and privacy of any and all information and data exchanged between you and the Website and Services cannot be guaranteed; and

(iii) Any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

14. DATA BREACH

In the event we become aware that the security of the Website and Services has been compromised or Users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the User as a result of the breach or if notice is otherwise required by law. When we do, we will post a notice on the Website.

15. CHANGES AND AMENDMENT

We reserve the right to modify this Policy or its terms related to the Website and Services at any time at our discretion. When we do, we will post a notification on the main page of the Website. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided. An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

16. ACCEPTANCE OF THIS POLICY

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services and submitting your information you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services.

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17. CONTACTING US

If you have any questions, concerns, or complaints regarding this Policy, the information we hold about you, or if you wish to exercise your rights, we encourage you to contact us using the details below:

dpo@abm.co.ke

We will attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by applicable data protection laws.

This privacy policy complies to the Data Protection Act 2019.

18. AMENDMENT SHEET

Issue/ Rev	Date	Page	Section	Description of changes	Requested By
1/00	21.10.09	All	All	New document	Group IT Manager
1/01	22.03.21	All	All	Addition of Chloride Exide, Precision Plastics Limited and Solinc Limited logos. Addition of requirements of gap assessment for ISO 27001 :2013. Change of department from Finance to IT.	Group IT Manager
1/02	22.08.29	All	All	Removal of Precision Plastics Limited logos. Change of prepared by section from Group IT Manager to IT Assistant.	System Coordinator
1/03	24.02.16	1	Admin	Change of IT Assistant to Network Infrastructure Specialist. Change of Group Internal Manager to Group IT Manager.	Group IT Manager
1/04	24.08.26	All	All	Removal of Solinc logo.	Group IT Manager
1/05	26.09.23	All	All	Change of Chloride Exide logo. Biennial document review.	Group IT Manager