



Redefining Digital Finance
Across Africa with Umoja Coin



COOKIE POLICY FOR UMOJA COIN

LAST UPDATE: OCTOBER 2025

**Building Africa's Financial
Freedom with Umoja**

INTRODUCTION

Welcome to www.umojacoin.com (“Website”), the official online platform of Umoja Coin, a digital currency and fintech ecosystem operated by Umoja Holding and its affiliates (“Umoja,” “we,” “our,” or “us”).

This Cookie Policy outlines how we use cookies and similar tracking technologies on our website, in accordance with the EU General Data Protection Regulation (GDPR) and other applicable privacy laws. This Cookie Policy is a comprehensive framework grounded in internationally recognized data protection laws and best practices. It is carefully structured to uphold the privacy rights of our users and ensure the responsible handling of personal data. By embedding key provisions from the EU General Data Protection Regulation (GDPR), other applicable regulations, this policy reflects Umoja’s unwavering commitment to transparency, accountability, and user empowerment. Through clear guidelines on consent, data usage, retention, we aim to foster trust and provide users with meaningful control over their digital footprint.

By continuing to use our website, you consent to the use of cookies as described in this policy.

WHAT ARE COOKIES?

Cookies are small data files stored on your device (computer, smartphone, tablet) when you visit a website. They enable the site to recognize your device, remember your preferences, and enhance your browsing experience.

Cookies enable us to perform deeper analysis of website traffic, user behavior, and engagement patterns. This insight allows us to continuously enhance the user experience, tailor our services more effectively, and refine our marketing strategies to better meet the needs of our audience.

WHY WE USE COOKIES

We use cookies to:

- Ensure the Website operates smoothly and securely
- Maintain and protect user sessions and data
- Analyze traffic, usage patterns, and performance
- Improve content, navigation, and overall user experience
- Personalize content and, where applicable, deliver targeted advertising

TYPES OF COOKIES WE USE

TYPE	PURPOSE	EXAMPLES
Strictly Necessary	Essential for core website functionality. These are First Party cookies	Login sessions, security token
Performance and Analytics	Understand user behaviour and site performance. Helps keep track of the number of visits on our site and the tabs which are mostly visited to ensure the users have a favourable experience while using the site. It is mostly used for statistics purposed	Google Analytics, Matomo
Functionality	Remember user preference and settings. Helps us add additional features in order to give our users a personalised web experience	Language selection, Saved pages, font changes and preference.
Targeting and Advertising	Deliver relevant marketing content (if enabled)	LinkedIn, Meta, Twitter(X) and Zoho Tracking, Google Ads (future use only)

Note: We currently use third-party advertising cookies [META] and we ask for your consent to continue the usage to give you quality service.

LEGAL BASIS FOR USING COOKIES

The primary legal basis for using cookies is obtaining informed, unambiguous, and freely given consent from users before placing non-essential cookies, a requirement under regulations like the GDPR. The EU GDPR mandates operators of websites and webpages to ensure that the consent of their web users are obtained.

Essential cookies (those necessary for the website to function) may be exempt, but users must still be informed about them. Websites must provide clear information about the cookies used and their purposes, allow for granular consent, and offer an easy way for users to change or withdraw their consent at any time.

- **Strictly Necessary/Essential Cookies** (those necessary for the website to function): We may be exempt from obtaining user consent, but users must still be informed about them Used based on our legitimate interest in providing a secure and functional Website.
- **Non-Essential Cookies:** Used only with your explicit consent, which you can manage via our cookie banner or settings panel.

We have provided a clear information about the cookies used and their purposes, allowing for granular consent, and offer an easy way for users to change or withdraw their consent at any time.

MANAGING & DISABLING COOKIES

You can control cookie usage in two ways:

1. **Cookie Banner and Preferences Panel:** Available on your first visit and accessible anytime thereafter.
2. **Browser Settings:** Configure your browser to block, allow, or alert you about cookies.

Important: While you have full control over your cookie settings, please note that disabling certain types of cookies especially those essential for core functionality may limit your ability to fully interact with our website or access certain features.

To ensure optimal performance, personalized content delivery, and a smooth browsing experience, we strongly encourage you to tailor your cookie preferences using our cookie management tools. This approach allows you to strike the right balance between convenience and privacy, ensuring that your data is protected while you enjoy the full benefits of our services.

By customizing your settings, you can:

- Enable features that enhance navigation and usability
- Receive content tailored to your interests and preferences
- Maintain control over how your data is collected and used

We are committed to transparency and user empowerment, and our cookie controls are designed to make privacy management simple and intuitive.

RETENTION OF COOKIE DATA

- **Session Cookies:** Deleted automatically when you close your browser.
- **Persistent Cookies:** Remain until their expiration date or until manually deleted.

Retention periods vary based on cookie type and purpose.

INTERNATIONAL DATA TRANSFERS

Some cookies used on our website such as those set by Google Analytics or other third-party services may result in the transfer of personal data across borders, including to jurisdictions outside your country of residence.

Umoja is committed to ensuring that such international data transfers are conducted in full compliance with applicable data protection laws, including the EU General Data Protection Regulation (GDPR), UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data Protection (“PDPL”), Nigerian Data Protection Act 2023 (NDPA), Nigerian Data Protection Regulation (NDPR) and the Kenya Data Protection Act (DPA, 2019).

To safeguard your data during these transfers, we implement robust protective measures, including:

- **Standard Contractual Clauses:** Legally binding agreements approved by regulatory authorities to ensure adequate data protection standards across borders
- **Data Processing Agreements:** Formal contracts with third-party providers [At the moment, Umoja does not make use of third-party services] that define how data is handled, stored, and protected
- **Provider-Specific Compliance Mechanisms:** Reliance on frameworks such as Privacy Shield (where applicable), Binding Corporate Rules (BCRs), or other lawful transfer mechanisms offered by the provider

These safeguards are designed to ensure that your personal data remains secure, confidential, and protected regardless of where it is processed. We continuously monitor our third-party relationships to ensure ongoing compliance and transparency.

YOUR RIGHTS

AT UMOJA, WE UPHOLD AND RESPECT THE RIGHTS OF OUR USERS. Our services and website have been thoughtfully designed to empower users to exercise their data protection rights with ease. In the event of a suspected or confirmed data breach, users can promptly report the issue through our dedicated channels. We are committed to transparency, accountability, and swift resolution in line with applicable data protection laws.

You have the right to:

- Withdraw your cookie consent at any time
- Request access to data collected via cookies
- Lodge a complaint with a relevant data protection authority (e.g. EU Supervisory Authority)

To exercise these rights, please contact us at email: legal@umojacoin.com.

THIRD-PARTY SERVICES WE USE

We may integrate third-party tools that set their own cookies. These include

- LinkedIn
- Twitter (x)
- MetaMask

We encourage users to review the privacy policies of each third-party provider integrated into our website to understand how they handle cookie data. These providers may set and manage their own cookies independently of Umoja, and their practices including data collection, retention, and international transfers are governed by their respective privacy frameworks. By consulting their policies, you can gain insight into how your data is processed, what types of cookies are used, and how to manage or opt out of tracking where applicable. However, we assure our users of our utmost regard to preservation of their data.

UPDATES TO THIS COOKIE POLICY

Umoja reserves the right to revise, amend, or update this Cookie Policy at any time to reflect changes in our practices, technologies, legal obligations, or user feedback.

When such updates occur:

- The “Last Updated” date at the top of this policy will be modified to reflect the most recent revision
- A clear and timely notice will be provided to users via our cookie banner, homepage notification, or a dedicated alert on the Website

We encourage users to review this Cookie Policy periodically to stay informed about how we use cookies and how those practices may evolve. Continued use of the Website after any changes have been posted constitutes your acceptance of the updated policy.

CONTACT US

For any questions, concerns, or feedback regarding this Cookie Policy or our data practices, please reach out us via:

Umoja Coin Compliance Team:

Email: legal@umojacoin.com

Website: www.umojacoin.com