

KENYA NATIONAL POLICE DT SACCO

DATA PROTECTION AND PRIVACY NOTICE

1 Introduction and general terms

Kenya National Police DT Sacco (“us”, “we”, or “KNPDTS”) relies on the goodwill and trust of our members, staff and all other stakeholders including the public. We are committed to safeguarding your personal data in line with the provisions of the law. When you provide us with your personal data, we are legally obliged to use the personal data in line with all laws concerning the protection of personal data, including the Data Protection Act 2019 the “DPA”) and the Data Protection (General) Regulations, 2021 (the “General Regulations”).

Please read this Data Protection and Privacy Notice carefully to understand our personal data and privacy management practices. This Data Protection and Privacy Notice explains the following:

- (a) What personal data we collect and process and how we use it.
- (b) The legal bases and purpose for collecting and processing your personal data.
- (c) How long we will hold your personal data.
- (d) Your rights as a data subject and how to exercise them.
- (e) Who we will share your personal data with.
- (f) When we will use your personal data to contact you.
- (g) A description of technical and organization measures.
- (h) How you may contact us.
- (i) Amendments to this Data Protection Notice

2 What personal data we collect and process

We may collect the following personal data from you:

2.1 Identification information

We collect personal data such as your name, your national identification/passport number, driver’s license details, and other government-issued identification information, to identify you and to open your KNPDTS account with us.

If personal data relating to children or persons with any contractual incapacity under the law is required, personal data will be collected through their legal guardian or legal representative, which may also require personal data of their legal guardian and legal representative to be collected.

2.2 Contact information

We collect your contact details such as your phone number(s), email address and postal address to contact you, in respect of the services we offer you.

Failure to provide us with the personal data above would make it impossible for us to offer our services to you, as we require your personal data to identify you, to contact you, and to make payments relating to the services we offer you. The identification, contact and payment information is mandatory for purposes of us offering services to you.

We may also collect credit information relating to you from credit reference bureaus, for purposes of the services we offer you, as applicable.

3 Lawful bases and purpose for collecting and processing your personal data

KNPDTS will only process your personal data where there is a lawful basis to do so. Below, we provide details on the personal data we collect, and the corresponding legal basis.

Personal data collected and processed	Lawful bases and purpose
Identification information i.e., your national identification/passport number, driver's license details, and other government-issued identification information	Collected and processed on the legal basis of contractual necessity, for the purpose of identifying you when offering you services.
Contact information i.e., your phone number(s), email address and postal address	Collected and processed on the legal basis of contractual necessity, for the purposes of: (a) Communicating with you for purpose of fulfilling our duties to you when providing you with services, and to keep you updated on developments relating to the services we offer you. (b) Reaching you, for purposes of verifying transaction instructions.

4 Personal data collected for direct marketing and other commercial purposes

We will only process your personal data for direct marketing and other commercial purposes where you have granted us consent to do so.

5 How long we will hold your personal data

Your personal data will be held by us for as long is necessary for us to offer you services. If we no longer offer you services, which would require us to continue holding your personal data, we will only retain the personal data, for as long as is necessary, for the purposes of:

- (a) establishing or defending a legal claim;
- (b) fulfilling a legal obligation; or
- (c) direct marketing (upon your consent).

We may, however, retain any derivative information (such as statistical data and analytics) for an indefinite amount of time on the condition that such personal data will have all identifying information relating to you removed and you will be unidentifiable.

6 Your rights as a data subject and how to exercise them

You have rights when it comes to how we process your personal data. These include rights to:

- (a) be informed about how we process your personal data.
- (b) access to your personal data that we hold in a machine-readable format.
- (c) object to the processing of your personal data.
- (d) seek correction of false and misleading personal data about you.
- (e) seek deletion of false and misleading personal data about you.
- (f) not be subjected to automated decision making without human intervention.

You can exercise your rights by making a written request to us at [relevant email address].

Your request will be promptly attended to. Where we are unable to honor your request due to the nature of the processing or to protect our own legitimate interests, we shall inform you of the reason for our denial of your request.

7 Who we will share your personal data with

KNPDTS shall from time to time, share your personal data with third parties. Such disclosures will be done in accordance with the law and, where necessary, with your consent or upon reliance on necessity, in which event, we will notify you. Below are some of the circumstances under which your personal data may be shared:

- a) **The Government (and Government agencies):** Your personal data may be shared with law enforcement agencies and other regulatory bodies where such disclosure is mandated by the law.
- b) **Credit reference bureaus:** Depending on the services we offer you, we will share credit information relating to you with credit reference bureaus.
- c) **Court orders:** Your personal data may be shared if a court order is obtained requiring that such information be shared.
- d) **Service providers:** Your personal information may be disclosed to our service providers where necessary to provide certain services to you or to protect our legitimate interests (including in the enforcement of a legal claim).

We will not, under any circumstances share or sell your personal data with any third party for marketing purposes and you will not receive offers from other companies or organisations as a result of sharing your personal data with us, without your consent.

8 Description of technical and organisation measures

KNPDTS will develop, implement, and maintain safeguards appropriate to its size, scope and business, its available resources, the amount of personal data that KNPDTS owns or maintains on behalf of others and identified risks (including de-personalization where applicable). These measures must be complied with accordingly.

KNPDTS will regularly evaluate and test the effectiveness of its technical and organization measures to ensure security of its processing of personal data, including sensitive personal data.

KNPDTS may only share personal data with third parties who agree to comply with this policy and have put in place adequate technical and organization measures for security and protection of the personal data to be shared by KNPDTS.

KNPDTS will maintain data security by protecting the confidentiality, integrity, and availability of the personal data.

9 How you may contact us

If you have any inquiries about this Data Protection and Privacy Notice, you can reach us through the below contact details.

Email address: [*]

Phone number: [*]

10 Amendments to the data protection and privacy notice

KNPDTS reserves the right to amend this notice at any time, with notice to you. All changes to this notice will be posted on the KNPDTS website.

11 Control Sheet

11.1 Revisions

Ver. No	Purpose of Revision	Review Date	Effective Date	Summary Amendments
1.0	Initial drafting			

11.2 Approvals & Review Frequency

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Designation	Name	Signature	Approval Date
National Chairman	David Mategwa		
Chief Executive Officer	Solomon A. Atsiaya	 	