

## 1. Preamble

This Privacy Policy describes how the Kenya Accreditation Service collects and uses personal data. It applies to existing and prospective customers, delegates attending training courses and stakeholders.

The term “us”, “we”, “our” or “KENAS” means the Kenya Accreditation Service Limited.

KENAS is registered as a data controller in respect of personal data. If you have any questions about this Privacy Notice and/or how we use your personal data, please get in touch with us via email; [info@kenyaaccreditation.org](mailto:info@kenyaaccreditation.org).

## 2. Data collected

The following data will be collected from Customers and prospective customers:

- a) Name, business address, job title, e-mail address, telephone number, and (if applicable) employer name;
- b) Business CVs provided by customers which may contain personal details such as home address;
- c) Details of qualifications & training records;
- d) Details of education (dates & name of institution);
- e) Names of personal referees as shown on CVs (position, home address and phone);
- f) Qualifications certificates and number reference which may contain pictures and an individual's date of birth;
- g) Opinions on competence; and
- h) Any personal data in Customer case files.

The following data will be collected from delegates attending public training courses:

- a) Name, address, phone numbers, employer name (if applicable);
- b) Passport details for the purposes of arranging travel or issuing visitation letters where relevant;
- c) Information about disability, medical conditions, allergies in order to facilitate course.

The following data will be collected from Stakeholders/potential stakeholders:

- a) Name, employer, address, email, job title.

## 3. Data Collection

How we collect your personal data:

- a) Directly from yourself via the information you provide to us;
- b) From your company/employer;
- c) From third parties, such as:
  - i) Accreditation Scheme owners
  - ii) Regulatory bodies
- d) Publicly available sources, such as:
  - i) Social media sites such as LinkedIn, Twitter and Youtube
  - ii) Web searches

## Data Collection Means

- a) Face to face when you meet us;
- b) Via regular mail (in writing);
- c) By telephone (including call recording);
- d) By e-mail;
- e) Via website registration;
- f) Via customer on boarding or application;
- g) Via the internet

## Purposes and legal grounds for using your data

- a) To prepare a proposal for you regarding the services we offer;
- b) To provide you with our services from time to time;
- c) To undertake any conformity assessment services, we provide to you;
- d) To deal with any complaints or feedback you may have or are involved with;
- e) To meet our compliance and regulatory obligations and as required by tax authorities or any competent court or legal authority;
- f) For marketing to you
- g) Training and performance monitoring of our staff;
- h) For the administration and management of our business, including but not limited to organising public training courses, recovering debts and archiving or statistical analysis;
- i) Seeking advice on our rights and obligations, such as where we require our own legal advice.

For each purpose set out above, we must have a legal ground for such processing.

## 4. Data Sharing/Disclosure

Your personal data may be shared with our internal teams/departments through internal reports and through access to central IT systems.

We also disclose your personal data to the third parties listed below:

- a) Our Assessors (to carry out conformity assessments);
- b) Third parties whom we engage to assist in delivering the services to you, such as IT providers, data storage providers, payroll suppliers and public relations advisers.
- c) Agents, advisers, intermediaries you advise us to share your data with;
- d) Our professional advisers where it is necessary for us to obtain advice and assistance, such as lawyers, accountants, auditors;
- e) Our Peer Evaluators where it is necessary for us to meet our obligations as Kenya Accreditation Service;
- f) Debt collection agencies and credit referencing agencies; and
- g) Relevant accreditation scheme owners, regulatory authorities or law enforcement agencies, subject to your agreement via a waiver of confidentiality.

## 5. Your rights

Under the Data Protection Act, 2019 you have certain rights in relation to the personal data that we hold. You may exercise these rights at any time by contacting us through [info@kenyaaccreditation.org](mailto:info@kenyaaccreditation.org).

In some cases, we may not be able to comply with your request due to our own obligations to comply with other legal or regulatory requirements. However, a response will be made informing you of the decision on your request.

Your rights are:

**a) The right to access your data**

You are entitled to a copy of the personal data we hold about you and certain details of how we use it. Your information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible. Subject to certain circumstances, there will not be a charge for dealing with these requests. We have created a Subject Access Request form to assist you making your request, which is available on request.

**b) The right to rectification**

We take reasonable steps to ensure that the information we hold about you is accurate and complete.

**c) The right to erasure**

In certain circumstances, you have the right to ask us to erase your personal data.

**d) The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal data.

**e) The right to data portability**

In certain circumstances, you have the right to ask that we transfer any personal data that you have provided to us to another third party of your choice.

**f) The right to object to marketing**

You can ask us to stop sending you marketing communications at any time.

**g) The right to withdraw consent**

For certain uses of your personal data, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal data.

## 6. Marketing

We may also use your personal data to provide you with information about services we provide which may be of interest to you where you have provided your consent for us to do so. This information may include alerts, newsletters and invitations to events or functions. We will communicate this to you in a number of ways including by post, telephone, email or other digital channels.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from marketing communications sent by us, you may do so at any time via email or by [unsubscribing](#) from our emailing list.

## 7. Duration of Retention of data

We will only retain your personal data for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations. Please contact us if you would like further information regarding the periods for which your personal data will be stored.

## 8. Security data

KENAS is committed to protecting your data. Our staff use mobile devices, such as laptops and mobiles that are encrypted. Where we outsource our Information Technology and Communications infrastructure and business systems, we use providers that possess the highest level of security. We also regularly test penetration to confirm the security of our systems, policies and procedures. Our staff receive periodic training on data protection and all our contracts with third parties include relevant confidentiality and data protection provisions.