## **Privacy Policy – EduSens Africa**

**Effective Date:** 1/11/2025

EduSens Africa (“EduSens,” “we,” “our,” or “us”) respects your privacy and is committed to protecting the personal data of students, parents/guardians, and other users of our services. This Privacy Policy explains how we collect, use, store, and share personal data in compliance with the **Kenya Data Protection Act, 2019 (the “DPA”)**, the Data Protection (General) Regulations, and any other applicable Kenyan law.

Please review this Policy regularly, as we may update it from time to time.

### **1. Scope of Our Services**

EduSens Africa provides:

* **AI-powered career guidance**
* **Career education programmes**
* **Job-shadowing experiences**

These services are intended for students **from junior secondary, senior secondary and above.**. **Parental or guardian consent is mandatory** for students under 18 years old before they can register or participate, and parents/guardians may follow or monitor their child’s progress at any point during enrollment or programme participation.

### **2. Information We Collect**

**a. Information You Provide** When you or your child registers or interacts with us (website forms, email, phone, WhatsApp, social media, or in person), we may collect:

* Student details: name, date of birth, school, education level
* Parent/guardian details: name, email, phone number, relationship to student
* Contact and billing information
* Any information necessary to match students with career guidance or job-shadowing opportunities

**b. Information We Collect Automatically**When you visit our website or platform, we collect anonymised technical data (e.g., IP address, browser type, pages visited, cookies).

**c. Publicly Available Information** We may supplement data from publicly available sources when relevant to our services.

### **3. Purpose and Legal Basis for data Processing**

We process personal data to:

* Deliver our AI career guidance, education, and job-shadowing services
* Verify parental/guardian consent and provide progress updates
* Communicate programme information, events, or community updates
* Improve and secure our website and services
* Comply with legal and regulatory obligations

Our legal bases under the Kenya Data Protection Act, 2019 include:

* **Consent** – especially for processing children’s data (from parent/guardian)
* **Performance of a contract** – to provide services you have requested
* **Legal obligation** – to meet statutory requirements
* **Legitimate interest** – to improve our platform and communicate relevant updates, balanced against your rights.

### **4. Children’s Data and Parental Rights**

* We require **verifiable parental or guardian consent** before collecting or processing a child’s personal data.
* Parents/guardians have the right to:  
  + Access and review their child’s data
  + Request corrections or deletion
  + Withdraw consent at any time (this may affect the student’s participation).

### **5. Data Sharing**

We do **not** sell personal data. We may share data only:

* With service providers who support our operations (e.g., secure cloud hosting, analytics) under strict confidentiality agreements
* With partner organisations or mentors solely to deliver job-shadowing experiences, and only with parental consent
* To comply with lawful requests, court orders, or legal obligations
* To protect the safety and security of students, staff, or the public

### **6. Data Storage and Retention**

* Data is stored securely on servers located in Kenya or other jurisdictions that provide an adequate level of data protection as required by the Kenya Data Protection Act.
* We retain personal data **no longer than necessary** for the purposes stated above—typically **five (5) years of inactivity** unless law requires a longer period or you request deletion sooner.

### **7. Security**

We implement appropriate technical and organisational measures to safeguard data against unauthorised access, loss, or misuse, including encryption, secure servers, and access controls.

### **8. Cookies**

Our website uses session and functional cookies to enhance user experience and site security. Cookies do not contain personally identifiable information. You can manage or disable cookies in your browser settings, but some features may not function properly.

### **9. Your Rights Under Kenyan Law**

Under the Kenya Data Protection Act, you (and parents/guardians for minors) have the right to:

* Be informed about how your data is collected and used
* Access the personal data we hold
* Request correction or deletion
* Object to or restrict processing
* Withdraw consent at any time
* Data portability where applicable
* Lodge a complaint with the **Office of the Data Protection Commissioner (ODPC)** if you believe your rights have been infringed.

To exercise any of these rights, please contact us in writing (see Section 11).

### **10. Third-Party Links**

Our website or communications may contain links to third-party sites. We are not responsible for the privacy practices of those sites. Please review their privacy policies separately.

### **11. Contact & Data Protection Officer**

EduSens Africa acts as **Data Controller and Data Processor** for the personal data it handles.  
**Data Protection Officer:**  
Email: info@edusensafrica.com  
WhatsApp: +254790966319

### **12. Changes to This Policy**

We may update this Privacy Policy to reflect changes in our practices or Kenyan law. Material updates will be posted on our website with a revised “Effective Date.”

**By providing personal data or using our services, you acknowledge that you have read and understood this Privacy Policy and consent to the practices described herein.**