



# THE KENYA NATIONAL WASTE PICKERS ASSOCIATION

## PRIVACY POLICY

For KeNAWPWA Mobile Application Effective Date: 2023

### 1. Introduction

The Kenya National Waste Pickers Association of Kenya ("KeNAWPWA", "we", "us", or "our") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, store, and share your personal information when you use our mobile application and services, in compliance with the **Data Protection Act, 2019 (Kenya)** and the **Constitution of Kenya, 2010**.

By creating an account, you consent to the data practices described in this policy.

### 2. Data Controller

For the purposes of the Data Protection Act, **KeNAWPWA** is the **Data Controller**

### 3. The Data We Collect

We collect the following specific data points based on your registration and usage of the App:

#### A. Personal Information (PII)

- **Identity Data:** First Name, Last Name.
- **Contact Data:** Mobile Number, Email Address (optional).
- **Location Data:** County of residence/operation.
- **Verification Data: National ID Number** (Collected for unique identification and verification of bona fide membership).
- **Biometric/Visual Data: Profile Image** (Used strictly for printing on the Digital/Physical Membership ID Card).
- **Organizational Data:** Registration ID (Reg ID) assigned by the Association.

## **B. Security Data**

- **Passwords:** Stored in hashed/encrypted format. We do not see your actual password.

## **C. Usage Data**

- Logs of when you access the app (Created at, Updated at timestamps).

## **4. Purpose of Collection (Why we need your data)**

We process your data for the following lawful purposes:

1. **Membership Verification:** To verify that you are a registered waste picker within a specific County.
2. **ID Generation:** To generate your official **KeNAWPWA Authorized Collector ID**, which requires your Name, Photo, ID Number, and Reg ID.
3. **Communication:** To send you critical alerts (via the Communications tab) regarding county updates, global announcements, or personal account notifications.
4. **Record Keeping:** To maintain an up-to-date register of members as required by the Societies Act.

## **5. Legal Basis for Processing**

We process your data based on:

- **Consent:** You explicitly agree to this policy when signing up.
- **Performance of a Contract:** The data is necessary to provide you with membership services (the ID Card).
- **Legitimate Interests:** To manage the association effectively and prevent fraud.

## **6. Data Retention**

We will retain your personal data only for as long as is reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

- If you leave the association, your data will be archived or deleted in accordance with our retention policy.

## **7. Data Sharing and Disclosure**

We do not sell your data. We may share your data with:

- **County Governments:** Limited data (Name, Reg ID) may be verified against County records to ensure compliance with local waste management by-laws.
- **Service Providers:** Technical partners hosting our database (e.g., Cloud providers), bound by strict confidentiality agreements.
- **Legal Authorities:** If required by a court order or the ODPC.

## 8. Your Rights (Under Kenya Data Protection Act)

As a data subject, you have the right to:

1. **Access:** Request a copy of the data we hold about you.
2. **Rectification:** Request correction of false or misleading data (e.g., changing your County or updating your Photo).
3. **Erasure:** Ask us to delete your data (Right to be Forgotten), subject to legal retention requirements.
4. **Object:** Object to the processing of all or part of your personal data.
5. **Portability:** Request transfer of your data to another entity.

To exercise these rights, contact us at **[Insert Contact Email]**.

## 9. Data Security

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way.

- Your National ID Number is treated as sensitive data.
- Passwords are encrypted.
- Database access is restricted to authorized personnel only.

## 10. Changes to this Policy

We may update this privacy policy from time to time. We will notify you of any changes by posting the new policy on this page and sending a notification via the App.