

Privacy Policy for Academia App

Effective Date: August, 2025

This Privacy Policy describes how **Open Crafts Interactive Limited** ("the Platform," "we," "us," or "our") collects, uses, processes, and protects your personal data when you use the Academia mobile application ("the App") and its related services.

The Academia App serves as a school portal for educational institutions, facilitating various academic and administrative functions such as unit registration, checking class schedules, booking classes, accessing academic records, and facilitating communication within the institution.

We are committed to protecting your privacy and handling your personal data in a transparent and secure manner, in accordance with the **Data Protection Act, 2019 (DPA)** and other applicable laws of Kenya.

By accessing, registering for, or using the App, you agree to the collection and use of your information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use our App or services.

1. Who We Are

Open Crafts Interactive Limited

Valley Road, Nairobi

P.O. Box 17 90105 Nairobi, Kenya

Phone: 0110877322

Email: info@opencrafts.io

We are registered as a Data Controller with the Office of the Data Protection Commissioner (ODPC) in Kenya.

2. What Personal Data We Collect

We may collect and process various types of personal data about you, which we have grouped together as follows:

- **Identity Data:** Includes your first name, last name, username or student/staff ID, gender, date of birth, and national identification number (if provided by your institution or required for specific services/compliance).
- **Contact Data:** Includes your email address, telephone numbers, and physical address (e.g., for official institutional records).

- **Profile Data:** Includes your username and password, academic program/department, faculty/student status, course enrolments, preferences, feedback, and survey responses.
- **Academic Data:** Includes unit registration details, class schedules, attendance records, grades, academic progress, assignment submissions, and other educational records provided by your institution.
- **Usage Data:** Includes information about how you use our App, such as features accessed, time spent on the App, and interactions with various modules.
- **Technical Data:** Includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this App.
- **Communication Data:** Includes records of your communications within the App (e.g., messages with faculty, forum posts) and your preferences in receiving communications from us or your institution.
- **Institutional Data:** Information provided by your educational institution for the purpose of setting up and managing your access to the App and its services.

We do not collect any **Sensitive Personal Data** (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) unless it is strictly necessary for a specific service and with your explicit consent, or as permitted by law and relevant institutional policies.

3. How We Collect Your Personal Data

We use different methods to collect data from and about you, including through:

- **Direct Interactions:** You may give us your Identity, Contact, and Profile Data by filling in forms or by corresponding with us or your institution. This includes personal data you provide when you:
 - Create or activate an account on our App.
 - Register for units or classes.
 - Submit assignments or participate in forums.
 - Request support or provide feedback.
- **Automated Technologies or Interactions:** As you interact with our App, we may automatically collect Technical Data and Usage Data about your equipment, browsing

actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.

- **Educational Institutions:** We receive most of your Identity, Contact, Profile, and Academic Data directly from your educational institution, which is responsible for providing accurate and authorized information to the Platform for the purpose of setting up and managing your account and access to services.
- **Third Parties or Publicly Available Sources:** We may receive personal data about you from various third parties and public sources, such as analytics providers (e.g., Google Analytics) or publicly available institutional directories, where relevant and permissible.

4. Purposes for Which We Will Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To Provide and Manage App Services:** To enable unit registration, display class schedules, facilitate class bookings, provide access to academic records (grades, attendance), and manage your overall interaction with the App's functionalities.
- **To Manage Your Account:** Including creating and managing your user profile, verifying your identity, and providing login access.
- **To Facilitate Communication:** To enable communication between you and your educational institution (e.g., announcements, messages from faculty, administrative notices).
- **To Support Educational Processes:** To facilitate the submission and tracking of assignments, access to educational resources, and other academic activities as integrated by your institution.
- **To Improve Our App and Services:** Including data analysis, research, testing, system maintenance, support, and hosting of data, to enhance user experience and app performance.
- **To Administer and Protect Our Business and This App:** Including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data, to ensure the security and integrity of the App.
- **To Comply with Legal and Regulatory Obligations:** Including fraud prevention and detection, and meeting requirements from government authorities or educational regulatory bodies.
- **To Provide Customer and Technical Support:** To assist you with any issues or queries related to the App's functionality.

5. Lawful Basis for Processing Your Personal Data

We rely on the following lawful bases for processing your personal data under the Data Protection Act, 2019:

- **Performance of a Contract:** Where processing is necessary for the performance of a contract to which you are a party (e.g., providing you access to the App's services as per the agreement with your educational institution), or to take steps at your request before entering into such a contract.
- **Legitimate Interests:** Where processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (e.g., your educational institution), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. We ensure a balance between our legitimate interests and your rights. Examples of legitimate interests include improving our services, ensuring app security, and providing efficient educational management tools.
- **Legal Obligation:** Where processing is necessary for compliance with a legal obligation to which we are subject (e.g., regulatory reporting, fraud prevention).
- **Consent:** Where you have given explicit consent for us to process your personal data for a specific purpose (e.g., for optional marketing communications not directly related to the core service). You have the right to withdraw consent at any time by contacting us.

6. Disclosure of Your Personal Data

We may share your personal data with the following categories of recipients:

- **Your Educational Institution:** Your personal data, including Identity, Contact, Profile, Academic, and Communication Data, will be shared with your registered educational institution (e.g., university, college, school) and its authorized personnel (e.g., administrators, faculty, department heads) to enable them to manage your academic records, provide educational services, and facilitate communication within the institution. Your institution acts as a Data Controller for much of this data.
- **Other App Users (within your Institution):** Certain information (e.g., your name, student ID, course enrollment) may be visible to other authorized users within your educational institution (e.g., classmates, group members, faculty) for the purpose of facilitating academic collaboration and communication within the App.
- **Service Providers:** Who provide IT and system administration services, hosting, analytics, and customer support. These providers process data on our behalf and are bound by strict confidentiality agreements.

- **Professional Advisers:** Including lawyers, auditors, and consultants who provide professional services to us.
- **Government Agencies and Regulators:** Where we are legally required to do so, or to protect our rights or the rights of others (e.g., educational regulatory bodies, law enforcement agencies, the ODPC).
- **Third Parties to Whom We May Choose to Sell, Transfer, or Merge Parts of Our Business or Our Assets:** Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International Transfers

We do not typically transfer your personal data outside Kenya. However, should it become necessary to transfer your personal data outside of Kenya (e.g., if our servers or data processing partners are located internationally), we will ensure that a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the Data Commissioner.
- Where we use certain service providers, we may use specific contracts approved by the Data Commissioner which give personal data the same protection it has in Kenya.

8. Data Security

We have implemented appropriate technical and organizational security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. These measures include:

- **Encryption:** Using encryption for data in transit and at rest where appropriate.
- **Access Controls:** Limiting access to your personal data to employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.
- **Regular Security Audits:** Conducting regular assessments and audits of our data processing systems.
- **Firewalls and Secure Servers:** Utilizing robust network security measures.

- **Data Minimization:** Only collecting and retaining data that is necessary for our stated purposes.
- **Incident Response Plan:** Having procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, or as instructed by your educational institution.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For example, academic records may be retained for longer periods as required by educational regulations or institutional policies.

In some circumstances, you can ask us to delete your data (see "Your Legal Rights" below).

10. Your Legal Rights (Data Subject Rights)

Under the Data Protection Act, 2019, you have the following rights regarding your personal data:

- **The Right to be Informed:** To be informed about the collection and use of your personal data (this Privacy Policy serves this purpose).
- **The Right of Access:** To request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **The Right to Rectification:** To request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **The Right to Erasure (Right to be Forgotten):** To request the erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we