KENYA

Privacy policy

Zurura Kids Ed Solutions Ltd · ODPC registration no. 599-9727-3215

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At Zurura Kids we know that information about children and their families is especially sensitive. This policy explains what personal data we process, why, who we share it with, how long we keep it and how you can exercise your rights.

It applies to the website **zururakids.com**, the school portal (**app.zururakids.com**) and the mobile apps **Zurura Kids - Family** (for parents and guardians) and **Zurura Kids** (for school staff), together the "Platform", when used in Kenya.

> If you are a parent or guardian: the information about your child is entered and managed by their school. For questions about what is recorded, or to ask for changes, you can contact the school or write to us. If your request is for the school, we will pass it on and help the school respond.

1. Who we are and how to contact us

The Platform is operated in Kenya by **Zurura Kids Ed Solutions Ltd**, Global Trade Centre, Hiromo Lane, Westlands, P.O. Box 85802, Nairobi, Kenya ("Zurura Kids", "we", "us").

We are registered with the **Office of the Data Protection Commissioner (ODPC)** under registration number **599-9727-3215**.

For any privacy question, or to exercise your rights, email **hello@zururakids.com** with the subject "Privacy".

2. Legal framework

We process personal data in line with Article 31 of the **Constitution of Kenya**, the **Data Protection Act, 2019** (the "Act"), the **Data Protection (General) Regulations, 2021** and other applicable laws, including the **Children Act, 2022** where relevant.

Terms such as “data controller”, “data processor” and “sensitive personal data” have the meaning given in the Act.

3. Our role: the school decides, we process data on its behalf

The Platform is a tool used by schools and other education providers (the “School”). We therefore distinguish two situations:

- **Data the School enters or manages on the Platform** (learners, parents and guardians, staff, attendance, daily records, messages, photos, fees, etc.): the School is the **data controller**, because it decides what is recorded and why. Zurura Kids is a **data processor**: we process that data only on the School’s behalf, on its instructions and to provide the service.
- **Data we process for our own purposes** (website visitors, demo requests, business contacts at schools, billing our customers, Platform security and aggregated statistics): in those cases Zurura Kids is the **data controller**.

The obligations between the School and Zurura Kids for the data we process on its behalf are set out in our Terms and conditions and in any contract signed with the School, as required by section 42 of the Act.

4. What data we process

a) If you visit our website. The details you type into our forms (name, email, school name, role and approximate number of learners; your free-assessment answers and, if you give it, your email; the details of an account-deletion request) and the technical data our server logs when you visit (IP address, browser, date and time).

b) If you have an account on the Platform. Name, email address, phone number, role (school leadership, staff, parent or guardian), the School you belong to, your relationship to the learner and your password, which we store in encrypted form.

c) Learner data recorded by the School. Depending on how the School uses the Platform, this may include:

- identification: name, date of birth, profile photo and any identifier the School records;
- class or grade, attendance, arrival and pick-up times, authorised pick-up persons and pick-up codes;
- daily records: meals, naps, activities, observations and messages;
- lesson plans, assessments and progress reports;
- photos and videos of activities;
- documents attached by the School or by parents;

- **health data**, such as allergies, medical conditions, medication and doctor's details, which is **sensitive personal data** under the Act.

d) Fees. Fee plans, instalments, balances and the receipts parents upload to report a payment. **The Platform does not process card or mobile-money payments and does not store card, M-Pesa or bank account details.**

e) Technical and app usage data. Device model and operating system, app version, push-notification identifier, error logs and usage events (for example, which screens are opened). **We do not collect your GPS location.** The app only uses the camera when you turn it on, to scan a QR code or take a photo.

5. Why we use data and our lawful basis

- **Providing the service to the School**: school–family communication, attendance, daily records, reports, fee management and the other features the School uses. Basis: our contract with the School and its instructions. As data controller, the School must have its own lawful basis.
- **Creating and securing accounts**: identifying each user and showing them only what their role allows. Basis: performance of a contract.
- **Sending service notifications and emails** (for example, a new message or a fee reminder). Basis: performance of a contract.
- **Providing support** and answering questions. Basis: performance of a contract and legitimate interests.
- **Security, fraud prevention and fixing errors**. Basis: legitimate interests and compliance with legal obligations.
- **Improving the Platform** using aggregated or anonymised usage statistics. Basis: legitimate interests.
- **Answering demo and website requests**, and sending product information to schools that ask for it. Basis: your consent or steps before entering a contract. You can tell us to stop at any time, as provided in section 37 of the Act.
- **Meeting legal obligations** (for example, tax) and lawful requests from authorities. Basis: legal obligation.

We do not sell personal data. We do not show advertising on the Platform. We do not use children's data for advertising, to build commercial profiles or to make automated decisions that affect them.

6. Children's data

Under section 33 of the Act, we process children's data only in a manner that protects and advances the **best interests of the child**, and only so the School can run its education and care service.

- The Platform is not designed to be used by children directly: accounts belong to adults (School staff and parents or guardians).
- The School is responsible for obtaining the **consent of a parent or guardian** that the Act requires before recording a child's data, especially health data and images.
- Each parent or guardian only sees information about the children in their care, and each staff member only sees what their role allows within their School.
- **We never use photos or data of children to promote Zurura Kids.**

7. Sensitive personal data (health)

Health information is only recorded if the School decides to do so to care for the child (for example, to know about an allergy). Access is limited to the School staff who need it and to the child's parents or guardians.

The School is responsible for having a lawful ground under sections 44 to 46 of the Act, including the consent of the parent or guardian, before recording it. We recommend recording only what is needed for day-to-day care.

8. Who we share data with

We only share personal data in these cases:

- **With the School** and, within it, according to the roles the School sets up.
- **With service providers** that process data on our behalf, under written confidentiality and security obligations. Today they include: cloud infrastructure, database and file storage (Supabase); the servers that run our website and API; email delivery (Hostinger); push notifications (Apple, Google and Expo); error monitoring (Sentry); and app usage analytics (PostHog, without screen recording). An up-to-date list is available on request.
- **With Zurura Kids SpA**, our related company in Chile that develops the Platform, only where needed to run or support the Platform and under the same protections as this policy.
- **With authorities** where the law, a court order or a lawful request requires it.
- **In a reorganisation, merger or sale** of Zurura Kids, with whoever continues to provide the service, who must respect this policy.

The apps are downloaded from the App Store and Google Play; Apple and Google process download data under their own policies.

9. Transfers outside Kenya

Some of our service providers store or process data outside Kenya, including in the United States, and our related company is in Chile. Under sections 48 to 50 of the Act, we only transfer personal data outside Kenya with appropriate safeguards, such as written data protection clauses, and we keep proof of those safeguards.

Where sensitive personal data, such as health data, is processed outside Kenya, the Act also requires the data subject's consent. The School is responsible for obtaining that consent from parents or guardians before recording health data on the Platform.

10. How long we keep data

- **Platform data**: for as long as the School keeps its subscription. When it ends, the School has **90 days** to export its information; after that we delete or anonymise it, unless the law requires us to keep something for longer.
- **Backups**: overwritten in their normal cycles. While they exist, they stay protected and are not used to run the service.
- **Website requests and business contacts**: up to 24 months from the last contact, or sooner if you ask us to delete them.
- **Tax and accounting records**: for the period the law requires (generally, 5 years).

In line with section 39 of the Act, we do not keep personal data longer than needed for the purpose it was collected for. The School can delete the data it manages sooner, under its own retention policy.

11. How we protect data

We use reasonable technical and organisational measures to protect data, including:

- encrypted connections (HTTPS) between the apps, the portal and our servers;
- encryption of stored data provided by our cloud infrastructure;
- separation of information by School, and access control based on each user's role;
- passwords stored in encrypted form, and internal access limited to people who need it, under a duty of confidentiality;
- error logging to detect and fix problems.

No system connected to the internet is completely secure, so we cannot guarantee absolute security.

12. Data breaches

If we become aware of a breach affecting data we process for a School, we will notify the School without delay and, where reasonably practicable, **within 48 hours**, as required by section 43 of the Act, with the information available so the School can meet its own obligations.

If the breach affects data for which we are the data controller, we will notify the ODPC **within 72 hours** where there is a real risk of harm, and inform the people affected where required.

13. Your rights

Under the Act you have the right to:

- **be informed** of how your personal data is used;
- **access** your personal data held by us;
- **object** to the processing of all or part of your personal data, including for direct marketing;
- **correct** false or misleading data;
- **delete** false, misleading or no longer needed data;
- **data portability**: receive your data in a structured, commonly used format;
- not be subject to a decision based solely on automated processing that significantly affects you. **Zurura Kids does not make such decisions.**
- withdraw your consent at any time where processing is based on it, without affecting processing carried out before.

To exercise these rights, email **hello@zururakids.com** with your name, the School (if any) and your request. To delete your account you can also use the form at **zururakids.com/ke/delete-data**. We may ask for information to verify your identity. Exercising your rights is free of charge.

If the request concerns data managed by a School, we will pass it on and help the School respond. We will reply within the time limits set by the Act and the Data Protection (General) Regulations, 2021.

If you are not satisfied with our response, you can complain to the **Office of the Data Protection Commissioner** (www.odpc.go.ke).

14. Cookies and similar technologies

Our website **does not use advertising or analytics cookies**. It only stores the country you chose in your browser, so we can show you the right version of the site. You can clear it in your browser settings.

The apps and the portal use error monitoring and usage analytics to keep the service running and improve it. They are not used for advertising.

15. Links to other sites

Our website may link to third-party services such as WhatsApp, the App Store or Google Play. Those services have their own privacy policies, which we encourage you to read.

16. Changes to this policy

We may update this policy to reflect changes in the law or in our service. We will publish the new version on this page with its date. If the changes are significant, we will also let Schools and users know by email or within the Platform before they take effect.

17. Contact

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