



Effective Date	June 02, 2026
Last Updated	June 11, 2026
Jurisdiction	Republic of Kenya
Governing Law	Kenya Data Protection Act, 2019; Data Protection (General) Regulations, 2021; Computer Misuse and Cybercrimes Act, 2018
Data Controller	Kelvata Analytics Hub
Contact	info@kelvataanalyticshub.com +254 701 418 508

1. Introduction

Kelvata Analytics Hub ("Kelvata", "we", "us", or "our") is a data analytics and business intelligence company incorporated and operating in Nairobi, Kenya. We are committed to protecting the privacy and personal data of all individuals who interact with our platform, services, and website at www.kelvataanalyticshub.com (the "Platform").

This Privacy Policy explains how we collect, use, store, share, and protect your personal information when you access our Platform or engage our services. It has been prepared in compliance with the Kenya Data Protection Act, 2019 ("KDPA"), the Data Protection (General) Regulations, 2021, and the Computer Misuse and Cybercrimes Act, 2018.

By using our services, you acknowledge that you have read, understood, and agree to this Privacy Policy. Where you do not agree, you should discontinue use of the Platform immediately.

2. Lawful Basis for Processing

Kelvata processes personal data only where a lawful basis exists under Section 30 of the Kenya Data Protection Act, 2019. The lawful bases we rely on are:

- Contractual necessity: Processing required to fulfil a contract with you or to take pre-contractual steps at your request.
- Legal obligation: Processing required to comply with a legal obligation under Kenyan law or any other applicable law.
- Legitimate interests: Processing necessary for our legitimate business interests, provided those interests are not overridden by your rights and freedoms. We conduct a Legitimate Interests Assessment (LIA) where this basis is relied upon.
- Consent: Where you have freely given specific, informed, and unambiguous consent. You may withdraw consent at any time without detriment.

3. Information We Collect

3.1 Information You Provide Directly

When you register as a Partner or use our services, we collect:

- Full name, job title, and business name
- Email address, phone number, and physical address
- Login credentials stored in encrypted form
- Financial and portfolio data uploaded to the Collection Intelligence Engine (CIE)
- Communication records when you contact us for support
- Identification documents where required for KYC or regulatory compliance

3.2 Information Collected Automatically

When you access the Platform, we automatically collect:

- IP address, browser type, device identifiers and operating system
- Pages visited, time spent and navigation patterns within the Platform
- Session tokens and authentication data for security purposes
- Error logs and system performance metrics

3.3 Partner-Uploaded Data

Partners using the Collection Intelligence Engine upload customer portfolio data, including debtor records, contact information, loan balances, and payment histories. This data is processed solely to provide the contracted analytics services. Partners uploading third-party personal data are responsible for ensuring they hold a valid lawful basis for such transfers to Kelvata.

3.4 Special Categories of Personal Data

Kelvata does not intentionally collect special categories of personal data as defined under Section 44 of the KDPa (including data concerning health, racial or ethnic origin, political opinions, religious beliefs, or biometric data). Partners must ensure that no such data is included in uploads to the Platform. If such data is discovered, Kelvata will notify the Partner and delete it within 72 hours.

4. How We Use Your Information

We process your personal data for the following lawful purposes under the Kenya Data Protection Act, 2019:

- To provide, operate, and maintain our analytics platform and services
- To authenticate users and secure access to the Partner Hub
- To generate analytics reports, predictive models, risk scores, and dashboards
- To communicate service updates, security alerts, and technical notices
- To respond to inquiries, support requests, and complaints
- To comply with legal obligations and regulatory requirements, including reporting to the Office of the Data Protection Commissioner (ODPC)
- To improve our platform through aggregated, anonymized usage analysis

We do not use your personal data for unsolicited marketing without your prior explicit consent. We do not engage in automated decision-making or profiling that produces legal or similarly significant effects without human review, unless specifically agreed in writing.

5. Data Sharing and Disclosure

5.1 Third-Party Service Providers

We may share your data with trusted third-party vendors who assist in operating our platform, including hosting providers, cloud infrastructure services, and security tools. All such vendors are contractually required to maintain confidentiality, process data only as instructed, and comply with data protection obligations at least equivalent to those imposed by the KDPA. We maintain a register of all sub-processors.

5.2 Cross-Border Data Transfers

Where personal data is transferred outside Kenya, Kelvata will ensure adequate safeguards are in place as required by Section 48 of the KDPA and the Data Protection (General) Regulations 2021, including:

- Transferring only to countries with an adequate level of protection as designated by the ODPC;
- Where no adequacy decision exists, relying on standard contractual clauses approved by the ODPC or binding corporate rules; or
- Obtaining your explicit consent to the transfer where permitted by law.

5.3 Legal Requirements

We may disclose personal data when required to do so by law, court order, or a lawful request from a competent government authority in Kenya, including the ODPC. Where legally permissible, we will notify you of such requests before complying.

5.4 Business Transfers

In the event of a merger, acquisition, or sale of all or part of Kelvata's business, personal data may be transferred as part of that transaction. We will notify affected users at least 30 days in advance and you may exercise your data subject rights in relation to such transfer.

5.5 No Sale of Personal Data

Kelvata does not sell, rent, trade, or otherwise commercially exploit personal data to third parties.

6. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by law:

- Partner account data is retained for the duration of the partnership and for 5 years after termination, in line with applicable commercial and tax record-keeping requirements.
- Uploaded portfolio data is deleted or anonymized within 90 days of contract termination unless required for active dispute resolution.
- Server logs and system access records are retained for up to 12 months.
- Data held pursuant to a legal hold or regulatory investigation will be retained until that matter is resolved.

Upon expiry of the applicable retention period, data will be securely deleted or anonymized using industry-standard methods. Kelvata maintains a Data Retention Schedule, available on request.

7. Data Security

Kelvata implements appropriate technical and organizational security measures, including:

- Encrypted data transmission using HTTPS/TLS protocols
- Password hashing and salting for credential storage
- Role-based access controls restricting data access to authorized personnel
- Three-layer caching architecture optimized for performance and security
- Regular security reviews, penetration testing and vulnerability assessments
- Access logs and audit trails for all data access events
- Appointment of a Data Protection Officer (DPO) as required by KDPA s.24

While we take all reasonable precautions, no method of internet transmission is completely secure. You acknowledge the inherent risks of transmitting data electronically. In the event of a security incident affecting your data, Kelvata will notify you and the ODPC within 72 hours of becoming aware, as required by KDPA s.43.

8. Personal Data Breach Response

Kelvata maintains a documented Data Breach Response Plan. In the event of a personal data breach:

- We will assess the risk to affected data subjects within 24 hours of discovery.
- We will notify the Office of the Data Protection Commissioner (ODPC) within 72 hours where the breach is likely to result in a risk to the rights and freedoms of individuals, as required by Section 43 of the KDPA.
- We will notify affected data subjects without undue delay where the breach is likely to result in a high risk to their rights and freedoms, including details of the nature of the breach and recommended protective action.
- We will document all breaches in our breach register, regardless of whether notification is required.

9. Your Rights Under the Kenya Data Protection Act, 2019

As a data subject in Kenya, you have the following rights under the KDPA:

- Right to be Informed (s.26): To know how your data is collected and used fulfilled by this Policy.
- Right of Access (s.26(a)): Request a copy of personal data we hold about you.
- Right to Rectification (s.26(b)): Request correction of inaccurate or incomplete data.
- Right to Erasure (s.26(d)): Request deletion of your personal data, subject to legal retention requirements.
- Right to Restriction of Processing (s.26(c)): Request that we limit processing in certain circumstances.
- Right to Data Portability (s.38): Receive your data in a structured, commonly used, machine-readable format.
- Right to Object (s.26(e)): Object to processing based on legitimate interest or for direct marketing.
- Right to Withdraw Consent (s.33): Withdraw consent at any time where processing is consent-based, without detriment.
- Right Not to Be Subject to Automated Decision-Making (s.35): Not to be subject to solely automated decisions with significant effects without human review.
- Right to Lodge a Complaint (s.56): Lodge a complaint with the Office of the Data Protection Commissioner (ODPC) at www.odpc.go.ke or +254 20 260 0330.

To exercise any of these rights, submit a written request to info@kelvataanalyticshub.com. We will respond within 21 days of receipt of your request. We will not charge a fee for reasonable requests.

10. Cookies and Tracking Technologies

Our Platform uses session cookies solely to maintain authentication and enable secure access to the Partner Hub. We do not use third-party tracking, advertising cookies, or behavioural profiling cookies.

A cookie is a small text file stored on your device. You may disable cookies through your browser settings; however, doing so may impair Platform functionality. By continuing to use the Platform with cookies enabled, you consent to our use of session cookies as described above.

11. Children's Privacy

Our services are not directed at individuals under 18 years of age. We do not knowingly collect personal data from minors. If a minor has provided us with personal data without appropriate parental consent, please contact us immediately and we will delete that data without undue delay.

12. Data Protection Officer

In accordance with Section 24 of the Kenya Data Protection Act, 2019, Kelvata Analytics Hub has appointed a Data Protection Officer (DPO). The DPO is responsible for overseeing data protection strategy and implementation, ensuring compliance with the KDPA, and serving as the primary point of contact for the ODPC.

To contact the DPO:

- Email: info@kelvataanalyticshub.com
 - Address: Kelvata Analytics Hub, Nairobi, Kenya
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13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in law, technology, or our practices. Material changes will be communicated via email or a prominent Platform notice at least 14 days before taking effect. The version history of this Policy is maintained on our website.

Continued use of the Platform after the effective date of any update constitutes your acceptance of the revised Policy. If you do not accept the changes, you must discontinue use of the Platform and may exercise your right to erasure.

14. Contact the Data Controller

Kelvata Analytics Hub

Email: info@kelvataanalyticshub.com

Phone: +254 701 418 508 | WhatsApp: +254 701 418 508

Address: Nairobi, Kenya | Website: www.kelvataanalyticshub.com

We aim to respond to all formal enquiries within 5 business days.

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www.kelvataanalyticshub.com | Nairobi, Kenya



KELVATA
ANALYTICS HUB

Driving Business Intelligence Through Data