

## **Telepost SACCO Privacy Policy**

### **Introduction**

Telepost SACCO respects and protects your right to privacy. This Privacy Policy outlines how we collect, process, and safeguard your personal data when you engage with us. Please read this policy in conjunction with our Data Protection Policy. It applies to all our members, employees, vendors, agents, and visitors accessing any of our premises, platforms, or services.

### **Definitions**

- **Member/Customer:** Any individual who joins Telepost SACCO, uses its services, or accesses our platforms.
- **Agent:** An individual or entity formally engaged to provide services on behalf of Telepost SACCO.
- **Visitor:** Any person, including third-party contractors, accessing our physical premises.
- **Vendor/Supplier:** A business or individual contracted to supply goods or services to the SACCO.
- **Employee:** Any person employed by Telepost SACCO under a formal contract.

### **About Us**

Telepost Savings and Credit Cooperative Society Limited (Telepost SACCO) is registered under the Co-operative Societies Act, Cap 490. Our core mission is to mobilize savings and provide affordable credit facilities to our members. As a data controller, we are committed to complying with the Data Protection Act, 2019 of Kenya.

### **Scope**

This policy applies to your interaction with any of our services, whether through our physical offices, website, mobile apps, online portals, or other platforms. Third-party sites linked on our platforms have their own privacy practices; please consult their policies separately.

### **Collection of Personal Information**

We collect your personal data with your consent when you:

1. Apply for SACCO membership, loans, or digital platforms like the Telepost App.
2. Use our services online, via mobile or physical platforms.
3. Contact us for inquiries, complaints, or support.
4. Respond to surveys, promotions, or competitions.

5. Subscribe to SMS, email, or social media updates.
6. Visit our premises or engage us as a supplier or agent.
7. Apply for insurance claims (e.g., funeral benefits).
8. Participate in official SACCO events or conferences.

We may also receive data from third parties such as:

- Credit reference bureaus (CRBs)
- Financial institutions
- Government databases
- Fraud prevention agencies

**Note:** We do not knowingly collect data from individuals under 18, unless legally authorized and registered through a guardian or as dependents.

### **Types of Information We Collect**

Your data may include:

- Identity details: Name, ID/passport, date of birth, gender, photo.
- Contact details: Phone number, email, physical address, postal address.
- Employment data: Employer name, job title, payroll number, NHIF/NSSF details.
- Financial information: Bank account, income data, KRA PIN, transaction history.
- Biometric data: Fingerprints or facial recognition (where applicable).
- Social data: Marital status, dependents, nominee information.
- Digital data: IP address, device ID, usage logs on our digital platforms.
- CCTV recordings from SACCO premises.
- Visitor logs and access control details (e.g., vehicle details, ID copy).
- Medical data in insurance and workplace incident reporting.

### **How We Use Your Information**

We use your information to:

1. Process applications and deliver our services to you.
2. Facilitate payroll deductions and loan repayments.

3. Conduct debt recovery and notify guarantors in cases of default.
4. Respond to inquiries or complaints.
5. Verify identity and carry out KYC obligations.
6. Perform credit checks and score applications.
7. Provide personalized marketing, unless you opt-out.
8. Fulfil legal, regulatory, or contractual obligations.
9. Improve service delivery through research and feedback.
10. Manage SACCO operations, including internal audits, staff records, and IT security.
11. Support HR, recruitment, and employee services.
12. Record visitor information for safety and incident tracking.
13. Monitor digital engagement to improve systems and services.

### **Data Storage and Security**

- Your data is stored securely on servers located within Kenya and via authorized cloud platforms.
- Passwords, account credentials, and sensitive data are encrypted.
- We implement physical, technical, and procedural safeguards to protect data.
- While we take all precautions, data transmitted online cannot be fully guaranteed as secure.

### **Legal Basis for Processing**

We collect and process your personal data based on:

1. Your explicit consent.
2. The need to perform a contract (e.g., membership or loan agreement).
3. Our legitimate business interests that do not override your rights.
4. Legal obligations (e.g., regulatory reporting, tax compliance).
5. Public interest or lawful requests by authorities.

### **Disclosure of Information**

We may share your information:

- With your consent.
- With service providers (e.g., CRMs, cloud hosts, marketing providers).
- With payment processors and identity verification partners.
- For collections with employers, guarantors, CRBs, debt collectors, auctioneers, and legal representatives.
- In case of business restructuring or asset transfer.
- To law enforcement or government bodies as required by law.

All third parties are contractually obligated to maintain data confidentiality.

### **Data Retention**

- Your data is retained as long as necessary for legitimate business or legal purposes.
- When no longer needed, your data will be securely deleted or anonymized.
- Archived data is isolated from active systems and protected from unauthorized access.

### **Your Data Protection Rights**

As a member or stakeholder, you have the right to:

1. **Request access** to your personal data and know how we process it.
2. **Request rectification** of inaccurate or incomplete information.
3. **Request erasure** (deletion) of your personal data, where applicable.
4. **Object to processing**, including marketing communications.
5. **Request restriction** of processing in certain cases.
6. **Request portability** of your data in a structured, machine-readable format.
7. **Withdraw consent** where processing is based on consent.
8. **File a complaint** with the Office of the Data Protection Commissioner (ODPC).
9. **Unsubscribe** from marketing by clicking the unsubscribe link in emails or contacting us.

### **How to Make a Request**

To access, update, correct, or delete your personal data, or to raise a concern regarding how we process your information:

**Contact us through:**

- **Email:** [dataprivacy@telepostsacco.co.ke](mailto:dataprivacy@telepostsacco.co.ke)
- **Call:** 020-5029200
- **WhatsApp:** +254 794 582 588
- **Visit:** Our Data Privacy Officer at Telepost SACCO offices (see address below).
- **Mail:** P.O. Box 49557-00100, Nairobi

We may request verification of your identity before processing certain data-related requests. We will respond within the timelines stipulated by law.

**Children's Data**

We do not knowingly collect data from persons under 18 years of age unless legally justified. If such data is found in our records, we will take steps to delete it.

**Cookies**

- Our website uses cookies to improve your user experience.
- You can adjust your browser settings to refuse cookies, though this may limit some features.
- For full details, refer to our [Cookies Policy](#).

**External Links**

Telepost SACCO platforms may contain links to third-party websites. We are not responsible for their privacy practices. Review their privacy policies before submitting your data to them.

**Policy Updates**

We may update this Privacy Policy from time to time. Updates will be published on our website and will be effective from the date of posting.

**Contacting Telepost SACCO**

If you have questions, requests, or concerns regarding this Privacy Policy or how we handle your data, contact:

**Data Protection Officer**

**Telepost SACCO Society Limited**

City Square Post Office, 5th Floor, Haile Selassie Avenue

**Call:** 020 5029200

**WhatsApp:** +254 794 582 588

**Email:** [dataprivacy@telepostsacco.co.ke](mailto:dataprivacy@telepostsacco.co.ke)

**P.O. Box:** 49557-00100, Nairobi, Kenya

**Complaints**

You have the right to lodge a complaint with:

**Office of the Data Protection Commissioner (ODPC)**

Website: <https://www.odpc.go.ke>