KRASPS Privacy Policy

Kenya Revenue Authority Staff Pension Scheme

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1 About this policy

Kenya Revenue Authority Staff Pension Scheme (KRASPS, the Scheme, we, us or our) explains here how we collect and use personal data through our website and related enquiries, contribution requests and member services. This policy helps you understand what information we need, who may receive it, and how to exercise your privacy rights.

It covers website visitors, members, prospective members, beneficiaries, representatives and other people who contact the Scheme. KRASPS, acting through its Board of Trustees and Secretariat, determines how personal data is used for these purposes. KRA may separately use employment, payroll or tax information under its own responsibilities. This policy addresses KRASPS processing; separate notices may also apply to a specific service.

2 Personal data we collect

- **Enquiries:** your name, email address, phone number if provided, subject, message, member or public enquiry category, and correspondence about your request.
- **Additional Voluntary Contributions (AVCs):** your name, email, phone number, payroll number, monthly pensionable salary, contribution action, rate or amount, effective date, identification document type and number, and signature image.
- **Subscriptions:** your email address and subscription status when you sign up for Scheme news and updates.
- **Related member services:** identity, employment, contribution, payment and beneficiary information in forms or supporting records you submit to the Secretariat or scheme administrator. The information required depends on the service requested.
- **Website and account use:** IP address, browser and device information, pages visited, interaction data, access times and technical logs. Where an account is provided, we also process account details, session information and records of administrative actions.

Please send only information needed for your request. Avoid entering identity documents, salary details, bank information, medical records or signatures in general enquiry messages. Use the designated form or ask the Secretariat for an appropriate submission channel.

3 Where information comes from

We receive information directly from you through forms, email and correspondence, and automatically through website technologies. Where necessary for a member service, information may also come from KRA as employer, CPF as scheme administrator, your authorised representative or a person handling a beneficiary claim. We use information from these sources for the relevant Scheme purpose.

4 Why we use personal data

- **Responding to enquiries:** to identify your request, communicate with you, refer it to the right team and keep a record of its resolution.
- **Administering contributions and benefits:** to check your identity and instructions, process AVC requests, coordinate authorised payroll deductions and support membership or beneficiary services.
- **Keeping you informed:** to send requested updates and relevant service communications. Optional newsletter subscriptions are separate from communications needed to administer your membership.
- **Operating and protecting the website:** to deliver pages and forms, maintain sessions, detect automated abuse, troubleshoot faults, understand website use and investigate misuse.
- **Meeting responsibilities:** to maintain Scheme records, answer lawful regulatory requests, support audits and handle complaints or legal claims.

We process data on an applicable lawful basis: consent for optional activities, performance of a contract or steps you request before a contract, a legal obligation, or a legitimate interest that does not override your rights. For example, our interests include answering enquiries, maintaining reliable services and preventing fraud. Any processing of sensitive personal data requires an additional condition permitted by Kenyan law.

5 Who receives personal data

Authorised Secretariat staff and trustees may access information needed for their duties. Where relevant to your request, we may share it with:

- **CPF:** enquiries may be referred to CPF with your name, phone number, subject, message and a reference number. We receive status updates and responses to help resolve the enquiry. The member portal linked from our website is operated separately by CPF.
- **KRA as employer:** identity, payroll and contribution instructions needed to implement authorised deductions or reconcile contributions.
- **Service providers and advisers:** providers supporting hosting, email, website maintenance, administration, audits or professional advice, to the extent needed for their work.
- **Authorities and authorised representatives:** regulators, courts or law enforcement where disclosure is lawfully required, and people authorised to act for you or entitled to receive information for a claim.

We limit disclosures to the relevant purpose. Providers handling data on our behalf must protect it and follow applicable instructions and contractual safeguards. Where a recipient determines its own purposes, its privacy notice also applies. We do not sell your personal data.

6 Your choices when providing data

You can browse public information without submitting a service form. Required fields are needed to handle the request concerned; without identity, payroll or contribution information, for example, we may be unable to verify or process an AVC instruction. Newsletter subscription is optional. You may withdraw consent where we rely on it, without affecting earlier lawful processing or information we must retain for another lawful reason.

7 Cookies and external website services

Cookies and similar technologies help maintain sessions and support website functions. Your browser can block or delete cookies, although this may affect sign-in, forms or embedded content. The technologies used depend on the feature you access and the services enabled on the website.

Microsoft Clarity: we use Clarity to understand interactions with the website through usage metrics, heatmaps and session replay. This may involve cookies, device and browser identifiers, and information about clicks, scrolling and navigation. Microsoft also receives information through this service. Read Microsoft's privacy statement at https://www.microsoft.com/en-us/privacy/privacystatement.

Google reCAPTCHA: forms use reCAPTCHA to help distinguish people from automated submissions. Google may receive device, browser, IP address and interaction information. Google Maps is embedded on the contact page and can also receive technical information when loaded. Google's privacy policy is at https://policies.google.com/privacy and its terms are at https://policies.google.com/terms.

External links and embeds: the CPF member portal, social media, maps, videos and other external services have their own privacy notices. Opening a link or loading embedded content may send information to that provider. Review its notice before entering personal data.

Where consent is required for optional tracking, it must be obtained before that tracking occurs. Reading this policy or browsing the website does not, by itself, give consent to every use of personal data. You may contact us about tracking choices or an alternative way to access a service.

8 Processing outside Kenya

Some external technology providers may process personal data outside Kenya. Before using a provider for such a transfer, we must establish a permitted transfer ground and appropriate safeguards, including contractual protections where applicable. Sensitive personal data requires additional safeguards and consent where required. Contact us for information about the arrangements relevant to your data.

9 Protecting and retaining information

We use technical and organisational measures appropriate to the information and risk. These include staff account authentication, access restrictions, session controls, records of administrative activity and measures to reduce automated abuse. People handling personal data must respect confidentiality. If a breach occurs, we will assess it and notify affected people and the regulator where the law requires.

We keep personal data only for as long as needed for the relevant purpose and applicable legal, audit or claims requirements. Enquiry records support resolution and follow-up; contribution instructions support member and payroll records; subscription records support updates and opt-out requests; technical logs support security and troubleshooting. Retention depends on the record type, the relationship and any outstanding dispute or legal duty. We will delete or anonymise information when it is no longer required, subject to controlled backup retention.

10 Your privacy rights

Subject to the conditions and exceptions in Kenyan data protection law, you may ask to be informed about processing, access your personal data, correct inaccurate data, object to processing, restrict it in applicable circumstances, or erase data we are not entitled to retain. You may also request portability where applicable and withdraw consent for processing based on consent.

Send your request to info@krasps.com with the subject Privacy request. Explain what you need and how we can contact you. We may ask for proportionate information to verify your identity or authority to act for someone else. Please do not attach identity documents unless we request them through an appropriate channel. We will respond within the applicable statutory period and explain any lawful limitation or refusal.

To stop optional newsletters, email info@krasps.com with the subject Unsubscribe, using the subscribed address where possible. You can also use the Contact Us form. Service messages needed to administer your membership may continue.

11 Children and information about others

Our online service forms are intended for adults. A child may nevertheless be a beneficiary or dependant. Where we need a child's information for a Scheme service, we will apply the protections required by law, verify the authority of the parent or guardian where necessary, and act in the child's best interests.

If you submit information about a beneficiary, dependant or another person, ensure you are authorised to do so and, where appropriate, share this policy with them. Providing another person's information does not remove their privacy rights.

12 Decisions and changes to this policy

Website validation, security checks and request routing may use automated tools. If a decision affecting you is based solely on automated processing and has legal or similarly significant effects, you may exercise the safeguards available under Kenyan law, including requesting human reconsideration where applicable.

We may update this policy when our services, data uses or legal requirements change. We will publish the revised version on the website and identify its revision date. Where a change requires a further notice or consent, we will provide that notice or seek consent before the new processing begins.

13 Contact and complaints

For questions, requests or complaints about KRASPS personal data, contact the Scheme Secretariat at info@krasps.com or through the Contact Us page on the KRASPS website. Please mark the message Privacy request or Privacy complaint. These channels cover requests about both website data and the related Scheme services described here.

If you have any concerns, complaints or queries regarding the collection, use, storage or processing of your personal data by KRASPS, please contact the KRASPS Secretariat through the designated contact channels provided on this website for assistance and resolution.

Any suspected or actual personal data breach should be reported to KRASPS immediately through the same channels to enable prompt assessment, investigation and appropriate action, including escalation to the Office of the Data Protection Commissioner (ODPC), where required under applicable data protection laws.

This policy is to be read with Kenya's Data Protection Act, 2019 and the applicable data protection regulations. It does not limit the rights and remedies available to you under law.