# **PRIVACY POLICY**

## Last Updated: 10.02.2025

This Privacy Policy explains how **Sauti Ya Bajeti** (the "Platform"), operated by the **Institute of Public Finance (IPF)**, collects, processes, stores, and protects your personal data when you interact with our Platform. By using the Platform, you consent to the practices described in this Privacy Policy.

### 1. Introduction and Scope

# 1.1 Purpose of the Privacy Policy

This document is intended to provide transparency regarding the information we collect and how it is used, shared, and secured. It applies to all users of the Platform.

# 1.2 Scope

This Privacy Policy covers:

- Data collected directly from you through interactions with the Platform (via WhatsApp or related interfaces).
- Data collected automatically as you use the Platform.
- Data processed and stored by IPF.

# 2. Information We Collect

# 2.1 User-Provided Data

When you interact with the Platform, we may collect:

- **Contact Information:** Your phone number, name, or any identifier provided via WhatsApp.
- **Content Submissions:** Any queries, messages, or other content you send through the Platform.
- Feedback and Comments: Opinions or feedback provided on the Platform's functionality or content.

# 2.2 Automatically Collected Data

We may also automatically collect certain data, including:

- **Usage Data:** Information on how you interact with the Platform (e.g., frequency of use, pages or sections accessed, and time stamps).
- **Device and Connection Information:** Data about the device you use to access the Platform, including device type, operating system, browser type (if applicable), IP address, and network information.
- Log Data: Information recorded by our servers, such as access times, request details, and error logs.

#### 2.3 Cookies and Similar Technologies

While the Platform primarily operates via WhatsApp, if you access any associated web interfaces,

cookies or similar tracking technologies may be used to enhance your user experience. Please refer to the specific website's privacy policy for details on cookie usage.

### 3. How We Use Your Information

### 3.1 Purpose of Data Processing

The information we collect is used for the following purposes:

- **Providing and Enhancing the Service:** To deliver accurate responses, improve the Platform's functionality, and develop new features.
- **Research and Analysis:** To analyze usage patterns, trends, and engagement to inform public finance research and advocacy.
- Security and Maintenance: To detect, prevent, and respond to technical issues or security breaches.
- **Compliance:** To comply with applicable laws, regulations, and legal processes.

# 3.2 Legal Basis for Processing

We process your data based on your consent (where applicable), the necessity of data processing to perform our contractual obligations, or to comply with legal obligations.

#### 4. Data Sharing and Disclosure

#### 4.1 Internal Sharing

• Information collected may be shared within IPF for purposes such as improving the Platform, research, and operational analytics.

#### 4.2 Third-Party Service Providers

• We may share data with trusted third-party vendors who assist with data analytics, maintenance, or other services. These providers are bound by confidentiality agreements and are prohibited from using your data for any purpose other than to assist us.

#### 4.3 Legal and Regulatory Requirements

• Your data may be disclosed if required by law, regulation, or legal process (e.g., a subpoena, court order, or government request).

#### 4.4 Aggregated and Anonymized Data

• We may share aggregated or anonymized data with third parties for research, reporting, or other purposes without revealing your personal information.

#### 5. Data Storage and Security

#### 5.1 Data Retention

- User Interaction Data: Retained only as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by law.
- **Anonymized Data:** May be stored indefinitely for research, historical analysis, or performance metrics.
- IPF will regularly review its data retention practices and securely delete data that is no longer necessary.

# 5.2 Security Measures

- **Encryption:** We employ encryption protocols for data in transit (e.g., communication via WhatsApp) and for sensitive data stored on our servers.
- Access Controls: Access to personal data is limited to authorized personnel with a legitimate need to access it.
- **Monitoring and Audits:** Regular security assessments and audits are conducted to safeguard against unauthorized access, alteration, or disclosure.

# 6. User Rights and Control

# 6.1 Access and Correction

- You have the right to request access to your personal data and to request corrections if any inaccuracies are found.
- Requests can be sent to our designated contact email.

#### 6.2 Data Deletion and Objections

- You may request the deletion of your personal data, subject to any legal or regulatory obligations that require retention.
- You also have the right to object to or restrict certain data processing activities.

#### 6.3 Exercising Your Rights

• To exercise any of your rights under this Privacy Policy, please contact us using the contact details provided below. We will respond to your request within a reasonable time frame, consistent with applicable law.

#### 7. International Data Transfers

• If your personal data is transferred or stored outside of your country of residence, IPF will ensure that appropriate safeguards are in place to protect your data in accordance with applicable data protection laws.

- WhatsApp: As the primary interface for accessing Sauti Ya Bajeti, WhatsApp's own privacy policies and terms apply to your data as handled by its platform. We encourage you to review WhatsApp's privacy policy for additional details.
- **Other Integrations:** Any third-party integrations utilized by the Platform are subject to their respective privacy policies and practices.

# 9. Changes to the Privacy Policy

- IPF may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements.
- Significant changes will be communicated via the Platform or through direct notification where feasible. Your continued use of the Platform after such changes constitutes your acceptance of the updated Privacy Policy.

# **10.** Contact Information for Privacy Inquiries

For any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact the Institute of Public Finance at:

- Email: sauti@ipfglobal.or.ke
- Website: www.ipfglobal.or.ke

#### **Final Remarks**

- **Transparency:** These Terms and Privacy Policy are intended to ensure transparency, accountability, and the secure use of Sauti Ya Bajeti.
- Attribution: When using or republishing content from the Platform, please provide clear attribution to Sauti Ya Bajeti, operated by the Institute of Public Finance.
- **Ongoing Improvements:** IPF is committed to continuous improvements of both the Platform's functionality and our privacy practices. We welcome your feedback.

By accessing and using Sauti Ya Bajeti, you confirm that you have read, understood, and agreed to these Terms of Service and Privacy Policy. Thank you for being part of our effort to promote public finance transparency and accountability.