



**ZAMARA GROUP
DATA PRIVACY NOTICE**

Version: 1

DATE APPROVED:

Contents

1. Information about us	2
2. What does this Privacy Notice cover?	3
3. What Is personal data?.....	3
4. How do we collect your personal data and how do we use your personal data?.....	4
5. What are your rights under the Data Protection Legislation?	13
6. What sensitive personal data do we collect and how?.....	13
7. Do we share your personal data?.....	14
8. Transfer of your personal data outside of the Republic of Kenya.....	14
9. We keep your personal data safe.	15
10. How long do we keep your personal data?.....	16
11. How we use Cookies & Beacons	16
12. How to Contact us.....	16
13. Amendments to this Privacy Notice.....	17
14. Changes to your personal data.....	17

The Zamara Group ('Zamara') is a financial services firm in the Republic of Kenya. Zamara understands that your privacy is important to you and that we care about how your personal data is used. We respect and value the privacy of all those whose lives we touch e.g., our customers and their beneficiaries and we will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the Data Protection legislation (as defined hereinbelow).

The Zamara Group of Companies in Kenya ("the Group") include:

- Zamara Holdings Limited ("ZHL")
- Zamara Actuaries, Administrators & Consultants Limited ("ZAAC")
- Zamara Risk & Insurance Brokers Limited ("ZARIB")
- Zamara Reinsurance Brokers Limited ("ZRBL")
- Corporate & Pension Trust Services Limited ("C&P")

And where the context so requires Zamara or Company shall refer to ZHL, ZAAC, ZARIB, or C&P as appropriate and Group shall refer to all the Companies.

This is Zamara Privacy Notice ("Privacy Notice") which may be accessed from our webpage <https://zamaragroup.com/> or a hard copy from our offices.

We are referred to in this Privacy Notice as "Zamara", "We" or "Our" or "Us". An individual who is the subject of the personal data is referred to as "Customer", "User" or "You".

This Privacy Notice only covers all the data that we process including:

- data you provide directly about yourself or your beneficiaries; or
- data provided by your employer on your behalf; or
- data provided by the Trustees of a retirement benefits arrangement or a social security fund you belong to; or
- data provided by an insurance company for whom you are a customer.

Zamara's employees or third-party vendors' personal details are handled in-line with the terms of employment agreement or contractual relationships, or our separate policies that we provide, as relevant, independent of this Privacy Notice.

1. Information about us

Zamara Holdings Limited, Zamara Actuaries, Administrators & Consultants Limited, Zamara Risk & Insurance Brokers Limited, Zamara Reinsurance Brokers Limited, Corporate & Pension Trust Services Limited are all limited companies registered in the Republic of Kenya:

Registered address: Ground Floor, Zamara Place, Chiromo Road/Wayaki Way, Westlands, Nairobi

Postal Address: P.O. Box 52439 - Code 00200

Email address: info@zamara.co.ke

Telephone number: +254 (20) 4969 000

Website: <https://zamaragroup.com/> ("Our website")

2. What does this Privacy Notice cover?

- 2.1 This Privacy Notice explains how we use your personal data: how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.
- 2.2 We will process any personal data we collect from you in accordance with this Privacy Notice and our Contract (together with any other documents referred to in it). Kindly read this Notice carefully so that you can understand how we handle your personal data.

3. What Is personal data?

- 3.1 Processing of personal data is governed by the Data Protection Act, 2019 ('the Act'), The Data Protection General Regulations 2021, The Data Protection (Registration of Data Controllers and Data Processors) Regulations 2021, The Data Protection (Complaints Handling and Enforcement Procedures) Regulations 2021 as may be amended from time to time, and any other regulations made thereunder (collectively, "the Data Protection Legislation").
- 3.2 Personal data refers means any information relating to an identified or identifiable natural person.
- 3.3 The personal data that we collect, and use is set out in Part 4, below.

4. How do we collect your personal data and how do we use your personal data?

A. PENSION SCHEME ADMINISTRATION AND CONSULTING SERVICES

Details of Personal Data Collected:

Data Collected	How We Collect the Data
Pension Scheme Members or Members of Social Security Funds: Name Dates of Birth Gender Address Contact Details – telephone and email address. Medical Reports Employment Details Date of joining and exiting/retirement from the scheme Date of death Identification documents – ID or passport number Marital Status Documents – copy of ID, passport, birth certificate, marriage certificate and/or death certificate Next of kin Beneficiaries/dependants – details pertaining to them (e.g., names, dates of birth etc) Financial data e.g., salary, pension contributions and balances KRA PIN number Bank account details	Most of the personal data that we collected is provided either by: <ol style="list-style-type: none"> i. by yourself ii. your employer (current or previous) iii. the Trustees of a retirement benefits arrangement or a social security fund that you are (or were) a member of

Financial details e.g., Member contribution, employee contributions Health status information	
Trustees: Names Dates of Birth Gender Telephone Address Academic Certificates	Most of the personal data that we collected is provided either by: <ul style="list-style-type: none"> i. by yourself ii. your employer (current or previous) iii. another Trustee of the retirement benefits arrangement

We process your personal data for one of the lawful bases of processing (“Lawful Basis”) depending on the specific purpose or purposes for which we are using your data (see table below).

<p>To provide our product and services</p> <p>We may use your personal information and financial information to:</p> <ul style="list-style-type: none"> • Provide pension scheme administration services including reconciliation of contributions received, paying benefits, safekeeping of data. This ensures the pension scheme is being run efficiently and that correct contributions are being paid on time and that the right person is being paid the right benefit at the right time. • Conducting regular statutory actuarial valuations, valuations for the purposes of benefit redesign, accounting disclosures or any other reason. • Perform fund accounting and fund administration for beneficiaries and pension members. • To provide advice regarding the investment strategy of the scheme and to enable preparation of net replacement ratio statements. 	<p>Our lawful basis for processing the data is performance of our contract with you or your employer (current or former) or the Trustees of the retirement benefits arrangement you belong to, or you belonged to. In addition, in certain circumstances the lawful basis is legitimate interest of the data controller.</p>
---	--

<p>We are required to submit Trustees information to statutory authorities e.g., the Retirement Benefits Authority and the Kenya Revenue Authority.</p>	<p>Performance of our contract with the Trustees of the retirement benefit arrangement for which you are also a Trustee.</p>
---	--

B. ACTUARIAL SERVICES – INSURANCE, HEALTHCARE, DATA ANALYTICS, DATA PRIVACY

Details of Personal Data Collected:

Data Collected	How We Collect the Data
<p>Name Dates of Birth Gender Health status Employment Details e.g., occupation Identification documents – ID or passport number Beneficiaries/dependants – details pertaining to them (e.g., names, dates of birth etc) Financial data e.g., salary KRA PIN number Bank account details Contact details. Nationality Information regarding dependants and beneficiaries (name, relationship, health status, identification documents, nationality)</p>	<p>Most of the personal data that we collected is provided either:</p> <ul style="list-style-type: none"> i. directly from you ii. by your employer (current or previous) iii. by the insurance company for whom you are a client

<p>For health insurance we also collect Date of admission and date of discharge from the health care centre, date of treatment for out-patients, and health care centre visited.</p>	
--	--

We process your personal data for one of the lawful bases of processing (“Lawful Basis”) depending on the specific purpose or purposes for which we are using your data (see table below).

<p>To provide our product and services</p> <p>We may use your information to:</p> <ul style="list-style-type: none"> • Conducting actuarial valuations, valuations for the purposes of product design or any other reason. • To provide data analytics and developing dashboards. • To determine and inform the pricing of insurance products. 	<p>Our lawful basis for processing the data is performance of our contract with you or your employer (current or former). In addition, in certain circumstances the lawful basis is legitimate interest of the data controller.</p>
--	---

C. INSURANCE BROKERAGE SERVICES

Details of Personal Data Collected:

Data Collected	How We Collect the Data
Name Financial details – Salary, Bank account Date of Birth Health Status Employment Details Identification documents – ID or passport number Insurance Benefit Utilization & Scope Treatment records Family details like Spouse details, children’s details	Most of the personal data that we collected is provided either: <ul style="list-style-type: none"> i. Directly by you ii. By your employer (current or previous)
Next of Kin: Names Dates of Birth Identification documents – ID or passport number Financial details – Salary, Bank account	Most of the personal data that we collected is provided either: <ul style="list-style-type: none"> i. Directly by you ii. By your employer (current or previous)

We process your personal data for one of the lawful bases of processing (“Lawful Basis”) depending on the specific purpose or purposes for which we are using your data (see table below).

<p>To provide our product and services</p> <p>We may use your information to:</p>	<p>Performance of our contract with you or your employer (current or former).</p>
--	---

<ul style="list-style-type: none"> • Offer insurance brokerage services to effectively analyse and facilitate suitable insurance coverage. • Provide scheme servicing services. • Conduct risk assessment exercise. • Facilitate claim processing. 	
--	--

D. MARKETING

Details of Personal Data Collected:

Data Collected	How We Collect the Data
Journalists – Name and Contact Details	The personal data is collected directly from you.
At events, those attending and those who visit the Zamara booth: Name, Photograph and Contact Details.	The personal data is collected directly from you
Individual Clients – Name, Contact Details and Identification Documents. This includes contacts from the Zamara Social Media Handles.	The personal data is collected directly from you

We process your personal data for one of the lawful bases of processing (“Lawful Basis”) depending on the specific purpose or purposes for which we are using your data (see table below).

<p>To provide our product and services</p> <p>We may use your personal information to:</p> <ul style="list-style-type: none"> • Follow-up and collect leads. • Record information of those who visited our offices, events or those who visited our booths. 	The legal basis is consent.
--	-----------------------------

- Perform community management through social media.

E. EVENTS & CONFERENCES

Details of Personal Data Collected:

Data Collected	How We Collect the Data
<p>Events attendees:</p> <ul style="list-style-type: none"> ▪ Contact Information: Your full name, email address, phone number, and organisation details (including your role at the organisation). ▪ Photographs and Videos: We may capture photographs and videos during the event, which may include images of attendees, including you. ▪ Feedback and Surveys: Any feedback, survey responses, or comments you provide to us about the event. 	<p>The personal data is collected directly from you or the individual registering on your behalf. Photos and videos are taken by the Zamara team.</p>

We process your personal data for one of the lawful bases of processing (“Lawful Basis”) depending on the specific purpose or purposes for which we are using your data (see table below).

<p>Purpose of Data Collection</p> <p>We collect and process your personal data for the following purposes:</p> <ul style="list-style-type: none"> ▪ Event Management: To manage and organize the event, including registration, communication, and logistics. ▪ Communication: To send event-related updates, information, and announcements to you. ▪ Marketing: To inform you about our future events, conferences, and services that we believe may be of interest to you. (You may opt-out of such communications at any time). 	<p>The legal basis is implied consent.</p>
---	--

- Promotional Material: To create promotional materials for marketing and publicizing our events, which may include using photographs and videos captured during the event.
- Feedback and Improvements: To analyse feedback and survey responses to improve the quality and experience of future events.
- Data Sharing: We may share your personal data with third parties for the following reasons:
 - Event Sponsors and Partners: We may share your contact information and/or photographs/videos with our event sponsors and partners.
 - Service Providers: We may use third-party service providers to assist with event management, communication, and data processing. These providers are contractually obligated to safeguard your personal data and use it only for the specified purposes.
 - Legal Compliance: We may disclose your personal data if required by law, regulation, or legal process.
- Photographs and Videos: During our events and conferences, we may capture photographs and videos for promotional purposes. By attending our event, you grant us permission to use these images and videos, including any images that feature you, for marketing and promotional activities. We may use some of the photographs and videos on our social media handles or websites.

F. INQUIRIES

Details of Personal Data Collected:

Data Collected	How We Collect the Data
Walk-ins: We collect: Name Contact details. Identification documents e.g., ID numbers/Passport	The personal data is collected directly from you
Individuals who call the Zamara customer care centre: We collect: Name Contact details. Identification documents e.g., ID numbers/Passport Voice recording	The personal data is collected directly from you

We process your personal data for one of the lawful bases of processing (“Lawful Basis”) depending on the specific purpose or purposes for which we are using your data (see table below).

To provide our product and services We may use your personal information to: <ul style="list-style-type: none"> • Offer Customer Services and Support • Improving Services 	The legal basis is consent.
--	-----------------------------

5. What are your rights under the Data Protection Legislation?

Under the Data Protection Legislation, you have the following rights, which we will always work to respect and uphold:

- 5.1 The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- 5.2 The right to access the personal data we hold about you.
- 5.3 The right to have your personal data corrected if any of your personal data held by us is false, erroneous or misleading.
- 5.4 The right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- 5.5 The right to restrict (i.e., prevent) the processing of your personal data.
- 5.6 The right to object to us to our use of your personal data for a particular purpose or purposes.
- 5.7 The right to withdraw consent. This means that, if we are relying on your consent as the lawful basis for using your personal data, you are free to withdraw that consent at any time.
- 5.8 The right to data portability. You have a right to request your personal data, which you have provided to us in a structured and commonly used format for your own use across different services.
- 5.9 Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- 5.10 For more information about our use of your personal data or exercising your rights as outlined above, please contact us by email as set out in Part 13. Note that the above rights are subject to exceptions and conditions set out under the Data Protection Legislation, and your positive identification as an individual for whom we process personal data.
- 5.11 It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.
- 5.12 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Office of Data Protection Commissioner. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first.

If you wish to exercise any of the rights mentioned above, kindly submit your request to our Data Protection Officer at dpo@zamara.co.ke

6. What sensitive personal data do we collect and how?

- 6.1 We may collect 'sensitive' personal data like data relating to your health status, gender, race, ethnic social origin, property details, marital status, family details including names and details of your children, parents, spouse or spouses, conscience, belief, genetic data, sex or the sexual orientation. We will only collect sensitive data about you if we have your explicit consent, or if authorised under the Data Protection Legislation.

7. Do we share your personal data?

All data sharing will be undertaken in line with the Data Protection Legislation.

8. Transfer of your personal data outside of the Republic of Kenya.

- Safeguarding your data remains our utmost priority. In accordance with Data Protection Legislation, we may occasionally need to transfer your personal data to service providers located outside the country in order to provide the services and enable the performance of contract.
- We want to assure you that the majority of your data is securely stored on our on-premises servers. When we do need to transfer your data, stringent safeguards are upheld to ensure its protection.
- Our commitment includes verifying that the destination country upholds the data protection principles. Furthermore, we establish a comprehensive written agreement with the recipient, mandating them to safeguard your data.

8.1 Within Zamara

- To ensure efficient administration and seamless operations and in order for us to perform a contract or as required by law, we share some of your personal data among different departments at Zamara, aligning with the principles of Data Protection Legislation and upholding your rights. Such sharing is conducted prudently and respects your privacy.
- Your personal data may be retained within our service repositories to fulfil our commitments and maintain accurate and current contact information across our services. This practice is essential in upholding your right to precise and up-to-date data.

8.2 Outside Zamara

A number of organisations assist us in delivering our products and services to you and we will share your information with these organisations. We will provide them reasonable access to your personal data for purposes of facilitating our service to you and due to legal obligation. For example: Insurance Companies, Auditors, Custodians, Fund Managers, Employers/Sponsors, Trustees of retirement benefit arrangements

8.2.1 We share information of beneficiaries and pension members with Trustees, Sponsors, Custodian, Fund Managers, Auditors, Insurance Companies and Actuaries (internal or external) as required for the performance of a contract.

8.2.2 We may share information with our banking service provider to facilitate payment processing.

8.2.3 We are legally obliged to share requisite personal data with the Kenya Revenue Authority, Retirement Benefits Authority and Insurance Authority of Kenya.

8.2.4 Where obliged by law, we will share some personal data with the Government, law and enforcement agencies. Where possible, we make this anonymous and only share statistics.

8.2.5 Where your consent is needed to transfer the data, we will make this clear to you in simple and clear language so you may make an informed decision.

We will never share your information if it's not legal to do so, and will always consider your rights, and whether there is another way of achieving our aim, before doing so.

9. We keep your personal data safe.

We use a high level of protection, both organisational and technical measures, to ensure we process our customers data safely. Some of the measures are:

9.1 Secure Servers

Our servers meet the highest standards for security, equipped with innovative firewalls, secure content delivery, network mechanisms, and a robust architecture. This ensures that your data remains safe and always protected.

9.2 Access Controls

Access to your data is granted only to authorized personnel through secure log-in procedures, closely monitored and restricted by our dedicated IT teams. Rest assured that your information is in expert hands. Our systems are only accessible through strictly controlled security processes, ensuring that only the right people have access to your valuable information.

9.3 Safeguarded Access to our premises

Our buildings and access-restricted areas can only be entered using staff passes and keys, providing an additional layer of protection for your data. Secure files are stored in these areas, ensuring that only authorized individuals can access them.

9.4 Encryption, a Virtually Unbreakable Lock

We employ industry-accepted hashing algorithms like SHA 256 and PBKDF2 to encrypt passwords, making them indecipherable to unauthorized parties.

9.5 Password Protection and Clear Desk Policy

We take every measure to safeguard your data, including password protection, adhering to a clear desk policy, and enforcing entry control to storage rooms where your personal information is stored.

9.6 Anonymization and Pseudonymization

Your privacy is of utmost importance to us. That's why we utilize advanced techniques like data anonymization and pseudonymization, ensuring your personal data remains protected without compromising your identity.

9.7 Secure Paper Data Storage

Even when data is stored on paper, it is kept securely locked away, with access limited to authorized personnel only.

9.8 Continuous Audits for Enhanced Security

Periodically, we conduct privacy and information audits and perform risk assessments at every stage of our projects involving personal data. This proactive approach allows us to maintain the highest level of security for your information.

9.9 Empowered Staff for Data Protection

Our team is trained rigorously in handling personal data appropriately to prevent data breaches, ensuring your information is in safe hands.

10. How long do we keep your personal data?

We are required under the Data Protection Legislation to keep your personal data only for specific period as lawfully required. Some of the considerations we consider when deciding on the retention of your data is:

- Where it is stipulated under the law; and
- The necessary time your data is needed for us to deliver the service to you.

As part of our commitment to you, we keep your data for only as long as required to fulfil the purpose for which it was collected. When that purpose is achieved, your data remains safely stored with us, ready to serve you whenever you need.

11. How we use Cookies & Beacons

We employ cookies to gather and retain insights regarding your interaction with our website. Further details can be found in our Cookie Policy, conveniently accessible at

[Terms & Conditions - Kenya \(zamaragroup.com\)](#)

12. How to Contact us

If you wish to contact us in respect of part of this Privacy Notice or have any questions or would like further information regarding our handling of your personal data, please find below contact details:

Ground Floor, Zamara Place

Chiromo Road/Wayaki Way

Westlands, Nairobi, Kenya

P.O. Box 52439 - Code 00200

City Square - Nairobi, Kenya

Email address: info@zamara.co.ke

13. Amendments to this Privacy Notice

We may change, modify, or adopt a new Privacy Notice from time to time.

If we do so, we will post it on our website and at our offices. It's your responsibility to check the Privacy Notice every time you submit your personal data to us. This version was last updated on 1 September 2023.

14. Changes to your personal data

Please keep us informed of any changes to your personal data by emailing us with full details of the changes at info@zamara.co.ke

Actuaries | Administrators | Consultants | Insurance Brokers

P.O Box 52439 – 00200 Nairobi



+254 (20) 4969 000

Zamara Place, Ground Floor



info@zamara.co.ke

Chiromo Road/Waiyaki Way, Westlands



www.zamara.co.ke