

The Family Group Foundation

Introduction

Your privacy is important to us. The Family Group Foundation (TFGF) is committed to keeping your personal data private. This privacy statement explains the personal data the Foundation collects, how it is processed, for what purposes and how you can exercise your rights in relation to processing of personal data.

This Website Privacy Statement should be read together with the terms and conditions, where in conflict, the Website Privacy Statement shall prevail.

1. Policy Purpose

In this Website Privacy Statement, we shall explain how The Family Group Foundation ("Foundation", "TFGF", "we" or "us") collects and uses personal information or data about you ("Your Information" or "Your data") when you visit this Website, electronically respond to our online interactions, use our mobile apps, social media channels or when you send us communications via any computer, mobile or other similar electronic devices (jointly "online services"). Our Privacy Statement does not apply when you leave our website, including third-party websites where our online advertisements are displayed or links to third-party websites which we do not operate or control. Please read the privacy statements and terms and conditions of these third-party websites and decide whether they satisfactorily protect your rights

2. How we collect Data from you.

We may collect and process your personal data through:

- Filling out Application Forms from the Foundation when applying for any of our High School Scholarships, Shared Value Initiatives or other services
- Visiting this website by use of Cookies
- Face-to-face conversation when you visit any of the Foundation's offices or branches and meet with our representatives or agents.
- Electronic communication (including telephone conversations) in order to provide our services to you.
- Filling our online forms on this website.
- Applications for employment or internship at The Family Group Foundation.
- Obtaining from third parties, when verifying details supplied by you in regards to sponsorships or donations.

3. The classes of data we collect

The following classes of personal information will be collected from you: -

- 1) Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

- 2) Personal information such as passport photos, Date of birth, Gender, Marital status, employment status, and Next of Kin
- 3) Financial information; estimated monthly income levels, bank account numbers and or other banking information.
- 4) Copies of your identity documents such as IDs or passports.
- 5) Name, family details, age, profiling information such as level of education, bank account status, income brackets, support documents such as birth certificates, death certificates, medical records etc.
- 6) Your contact with us, such as when you call us or interact with us through social media, email (we may record your conversations, social media or other interactions with us),

4. Legal Basis for Collecting the Information

This privacy statement aims to give you complete and transparent information on how we process your personal data. We are committed to ensure that your personal information is processed in a way that is compatible with the specified, explicit, and legitimate purpose of collection. We process your personal data in accordance with the Data Protection Act No. 24 of 2019

We will only use your personal information where we have your consent or where we have another lawful reason including:

- 1) To carry out our obligations from any contracts entered into between you and us or to take steps to enter into an agreement with you.
- 2) When you have given consent to the processing of your information for one or more specific purposes
- 3) Processing is necessary for compliance with a legal obligation to which the Foundation is subject, and processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- 4) Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party
- 5) To meet our regulatory compliance and reporting obligations
- 6) To respond to your queries and complaints to us and any other requests that you may have made to us
- 7) To prevent, detect, and investigate fraud and alleged fraud practices and other crimes
- 8) Any purpose related to the prevention of financial crime, including sanctions screening, monitoring of anti-money laundering and any financing of terrorist activities.
- 9) To verify your identity in order to secure the Foundation's Project activities
- 10) To evaluate, develop and improve our services to you and other stakeholders.
- 11) To protect our legitimate interests and to develop our program strategies
- 12) To contact you, by post, phone, text, email and other digital methods. This may be for reasons such as to keep you updated on our initiatives.

To give an account of our Project activities to our benefactors/Donors regarding services rendered to you by the Foundation

5. Sponsorships and Donations

The Foundation processes personal data of individuals or persons who are sponsored under our various sponsorship initiatives and even those who may facilitate the sponsorship. When entering into an agreement with you for sponsorships and donations, we shall equally process your personal data to meet both legal and / or regulatory obligations which maybe: -

- The prevention, detection, investigation and prosecution of crime in any jurisdiction (including, without limitation, money laundering, terrorism, fraud and other financial crime);
- Government sanctions screening;
- To comply with local or foreign law, regulations, directives, judgements or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency, or exchange body.

We may also process your personal data where it is in our legitimate interests, to seek professional advice, including, in connection with any legal proceedings (including any prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights.

6. Data Disclosures to Third Parties

Members of TFGF, including our staff and advisers, may disclose your personal data to any of the following parties: -

- To internal members of staff of The Family Group Foundation anywhere in the world, including any officer, employee, agent or director;
- Professional advisers (including auditors), third party service providers, agents or independent contractors providing services to support the Foundations business;
- Any person to whom disclosure is allowed or required by local or foreign law, regulation or any other applicable instrument;
- Any court, tribunal, regulator, enforcement agency, exchange body, tax authority, or any other authority (including any authority investigating an offence) or their agents.
- Your Legal representative and their legal advisers, upon your death or mental incapacity.
- For children and minors, their personal details will be shared by their parents and legal guardians.
- Public authorities and institutions (e.g., Regulatory Authority, Financial Authorities, Law Enforcement Agencies)

- Stakeholders from government, religious and administrators which forms part of County selection panel members
- Other key stakeholders who are directly involved in the process of identifying, shortlisting, interviewing and onboarding the Foundation's beneficiaries of Sponsorships and Donations

7. Processing personal data of children

Our High School Scholarship programs will involve the collection and processing of some Personal Information of children and youth below the legal age of 18. The collection and processing of this data is necessary to enable us process their scholarship applications. We therefore require express consent from their parents or guardians.

If you are a child or youth, you should review this Privacy Statement with your parents or guardians to make sure that you understand and consent to everything in it. If you are under the age of 13, you should not access this Website or provide us with any Personal Information unless your parent or guardian has consented. If we discover that we have collected Personal Information from a child without parental consent, we will delete that Personal Information.

8. Data Retentions

We process and store your personal data only to perform our obligations under the agreement with you or as long as the law requires us to store it. The statutory legal requirement is 7 years. If the data is not required anymore for statutory or contractual obligations, it will be deleted. That rule does not apply, if processing is for the following purpose:

1. Keeping evidence in the context of statutory limitation periods governed by the law of Kenya
2. Legal requirements emanating either from court orders or government agencies such as Law Enforcement

9. Your Rights

You have the following rights as stipulated by the Data Protection Act:

1. To Request access to a copy of Personal Data processed by us in relation to you.
2. To Request correction of false or misleading Personal Data we hold about you; Please note we shall verify the accuracy of the information you provide us
3. Request erasure of your Personal Data where there is no good reason for us continuing to process it. Please note that we reserve the right to decline this request for specific legal or regulatory obligations
4. To object to the processing of all or part of their personal data.
5. Not to be subjected to Automated decision making, however, in certain situations the Foundation may continue processing if we have legitimate reasons to do so.

6. Request the transfer of your Personal Data to you or a third party.
7. Right to restrict and withdraw your consent to the processing of your Personal Data. We may in certain circumstances continue to process if we have a legitimate reason to do so; because this will not affect the lawfulness of any processing carried out before you withdraw your consent.

In exercising your right as provided above, we may request specific information from you to help us confirm your identity. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Queries and concerns about your rights should be directed to The Family Group Foundation , Daykio Plaza, Ngong Rd, P.O Box 74145-00200 Nairobi or E-mail: dataprotection@familybank.co.ke

10. Complaints

If you have a complaint in relation to the processing of your personal data and you are not happy with the way we deal with it, please discuss with the Family Group Foundation Secretariat by emailing info@thefamilygroupfoundation.org

You also have the right to complain to the data protection officer. Details can be provided by emailing dataprotection@familybank.co.ke

11. Changes to this Privacy Policy

This Privacy Policy may be updated from time to time and you are advised to visit this site regularly to check for any amendments.

This policy was last updated on 1st August 2023.