

## **PRIVACY POLICY**

**Effective Date:** June 24, 2025

**Company:** Emerging Writing Pad Solutions

**Website:** <https://writingpadsolutions.com>

**Email:** info@writingpadsolutions.com

**Phone:** +254 723 221941

**Jurisdiction:** Republic of Kenya

### **1. Introduction**

This Privacy Policy outlines how Emerging Writing Pad Solutions collects, uses, discloses, and protects your personal information when you visit or use our website, <https://writingpadsolutions.com>, or interact with us through any communication channel. As a Kenyan-based company offering expatriate support and business registration services, we value the privacy and confidentiality of our clients, partners, and site visitors. This document is prepared in accordance with the Data Protection Act of the Republic of Kenya and applies to all data subjects whose information we collect in connection with our services. Please read this policy carefully to understand our practices regarding your personal data.

### **2. Scope of Policy**

This Privacy Policy applies to all personal information collected through our website, social media platforms, email communication, phone calls, and in-person interactions. It also covers data collected through our forms, mobile-friendly pages, online tools, and all third-party systems integrated into our service delivery. The scope includes information collected from clients, applicants, vendors, and website visitors, regardless of location. However, legal obligations under Kenyan law will govern our response to privacy issues, especially for data subjects residing in Kenya. By using our services or accessing our website, you agree to the terms of this Privacy Policy.

### **3. What Personal Data We Collect**

We may collect a wide range of personal information, depending on the nature of your interaction with us. This includes, but is not limited to, your full name, national ID/passport number, phone number, email address, postal address, business registration details, tax information (PIN), immigration-related documents, and employment history. We may also collect device information (IP address, browser type, geolocation) when you interact with our website. For expatriate services, we may collect additional documentation such as CVs, visa copies, academic credentials, and employment contracts to facilitate your applications with government bodies.

## **4. How We Collect Data**

We collect personal data in several ways: (1) directly from you when you fill out online forms, send us emails, or call our offices; (2) through automated technologies such as cookies when you browse our website; and (3) from third-party sources, such as government agencies or your employer (with your consent). We ensure that data is only collected for legitimate purposes and stored securely. All forms on our website use SSL encryption, and our staff is trained to collect and manage data with utmost care and confidentiality.

## **5. Use of Collected Data**

We use your data strictly for the purposes for which it was collected. These include providing expatriate permit assistance, business registration, correspondence, processing government forms, client management, compliance tracking, billing, marketing (only with your consent), and internal record-keeping. We may also use your information to personalize services, conduct internal audits, detect fraud, and improve our digital services. We do not use your data for purposes unrelated to your engagement unless we first notify you and obtain your consent.

## **6. Legal Basis for Processing**

Under the laws of the Republic of Kenya, we must have a legal basis to collect and process your personal data. The legal bases we rely on include your consent, fulfillment of contractual obligations, legal compliance, and our legitimate interest in offering quality services. We do not collect or process personal data without a valid and lawful justification.

## **7. Consent**

We collect and process your data based on your informed consent. By providing your information to us—either online, via email, or in person—you agree to its use as outlined in this Privacy Policy. You have the right to withdraw your consent at any time by contacting us. Withdrawal of consent may affect our ability to continue offering certain services.

## **8. Data Retention**

We retain your personal data only for as long as necessary to fulfill the purpose for which it was collected. In general, this is up to 7 years unless a longer retention period is required by Kenyan

law, particularly with respect to immigration records and business documentation. After this period, your data is securely deleted or anonymized.

## **9. Disclosure to Third Parties**

We do not sell or lease your personal data. However, we may share your information with trusted third parties such as legal consultants, government agencies (e.g., Department of Immigration Services, Registrar of Companies), and IT service providers, strictly for service delivery purposes. All third parties are required to protect your data and use it only for authorized tasks.

## **10. Cross-Border Data Transfers**

If your personal data needs to be transferred outside Kenya (e.g., for cloud storage), we will take appropriate steps to ensure that your data remains protected, such as using secure transfer protocols and entering into data protection agreements with service providers.

## **11. Cookies and Tracking**

Our Website uses cookies to enhance user experience, analyze traffic, and offer tailored services. Cookies help us recognize repeat visitors, track browsing patterns, and compile aggregate data. You may disable cookies in your browser settings, though this may limit some functionalities on our Website.

## **12. Children's Privacy**

Our services are not intended for individuals under the age of 18. We do not knowingly collect personal information from minors. If we become aware that data from a minor has been collected without parental consent, we will take steps to delete such information promptly.

## **13. Data Security**

We implement robust physical, electronic, and administrative safeguards to protect your personal data. These include firewalls, password protections, encrypted communications, and access control protocols. Staff are trained regularly on data handling and confidentiality.

## **14. Your Rights Under Kenyan Law**

As a data subject, you have the following rights under Kenyan law: the right to be informed, access your data, rectify inaccuracies, object to processing, request data portability, and request deletion. To exercise any of these rights, contact us at [info@writingpadsolutions.com](mailto:info@writingpadsolutions.com).

## **15. Data Subject Requests**

You can make requests regarding your data at any time. We will respond within 21 days, in accordance with the Data Protection Act. Requests must be verified to ensure that they are coming from the data subject or an authorized agent.

## **16. Access to Your Data**

You have the right to request access to the personal data we hold about you. We may charge a small administrative fee depending on the nature of the request, but we will notify you before proceeding.

## **17. Correction of Data**

If you believe any of the information we hold about you is incorrect, you may request correction or updating. We will promptly make any necessary changes upon verification.

## **18. Right to Be Forgotten**

You may request that we delete your personal data. We will honor such requests unless retention is necessary to comply with legal obligations, resolve disputes, or enforce our agreements.

## **19. Marketing Communication**

We will only send you marketing communications if you have opted in. You may unsubscribe from our marketing emails at any time by following the opt-out link provided in each message or by contacting us.

## **20. Third-Party Links**

Our website may contain links to external websites, plugins, or services not operated by Emerging Writing Pad Solutions. Clicking on such links may allow third parties to collect or share data about you. We are not responsible for the privacy practices of those websites. We strongly advise you to read their privacy policies before sharing any personal data. We do not control and are not responsible for the content, security, or data handling of any external websites.

## **21. Data Processing Agreements**

All third parties processing personal data on our behalf are required to sign binding agreements (Data Processing Agreements) that outline how they handle, store, and secure data. These agreements ensure compliance with the Data Protection Act of Kenya and require third parties to process your data only according to our instructions and for the purposes we specify.

## **22. Data Breach Notification**

In the unlikely event of a data breach, we will notify affected individuals and the Office of the Data Protection Commissioner within 72 hours as required by law. Our notification will include the nature of the breach, the types of data affected, possible consequences, and the measures taken to address it.

## **23. Use of Social Media**

We maintain active social media pages for engagement and communication purposes. If you interact with us through platforms like Facebook, LinkedIn, or Instagram, please note that your information may be collected by those platforms based on their own privacy terms. We do not collect or store your social media credentials or behavior unless you share them directly with us.

## **24. Surveys and Feedback Forms**

From time to time, we may request you to participate in surveys, feedback requests, or reviews to help improve our services. Participation is voluntary, and any personal data provided will be treated in accordance with this Privacy Policy and used solely for internal analysis and service improvement.

## **25. Use of Biometrics**

We do not collect or process biometric data (e.g., facial recognition, fingerprints) unless specifically required by law or for immigration compliance services, and only with your informed consent. Such data, if collected, is stored under strict security protocols and retained only as long as necessary.

## **26. Client Files and Documentation**

Client files, such as scanned copies of passports, registration documents, employment contracts, and application forms, are stored in encrypted folders with restricted access. Only authorized personnel can access these files for processing your service request. We do not share these files with any third party unless explicitly required for service delivery.

## **27. Updates to Our Privacy Policy**

We may revise this Privacy Policy periodically to reflect changes in law, technology, or service offerings. The most recent version will always be available on our website. If material changes are made, we will notify users via email or a prominent website notice. Continued use of our services constitutes acceptance of the updated policy.

## **28. Website Analytics**

We use web analytics tools (e.g., Google Analytics) to gather non-personal statistical data about how users interact with our website. These tools help us understand traffic sources, user behavior, and popular content, enabling us to optimize user experience. This data is aggregated and does not directly identify any individual.

## **29. Storage and Backup**

Your data is stored securely in cloud-based systems with regular backups to prevent loss. Our servers are protected with firewall security, anti-malware tools, and access controls. Regular security audits are conducted to ensure that data remains safe and recoverable in the event of an outage.

### **30. Legal Compliance**

We are fully compliant with the Data Protection Act, 2019 (Kenya), and all other relevant legislation related to information and communication technology. Where required, we register with the Office of the Data Protection Commissioner and uphold all obligations as a data controller and processor.

### **31. Use in Legal Proceedings**

Your personal data may be used in legal proceedings or to enforce our agreements, particularly in cases of fraud, abuse, or unpaid services. Such use will comply with court orders and the applicable laws of the Republic of Kenya.

### **32. Automated Decision Making**

We do not use automated decision-making or profiling in a way that has legal or significant impact on clients. Any automated tools we use (e.g., data validation tools) are solely for improving service speed and accuracy, and human review is always available upon request.

### **33. Employee and Staff Data**

We collect and retain personal data of our employees for HR, payroll, and legal compliance. This includes employment records, ID numbers, and emergency contacts. Such data is stored in confidential files accessible only by the authorized HR personnel.

### **34. Use of Email Communications**

All communications via email, including inquiries, applications, or complaints, are recorded and stored securely. We monitor emails for internal quality assurance and legal compliance. Users should avoid sharing sensitive personal data via unencrypted email and instead use our secure forms where possible.

### **35. Video and Audio Recording**

If you participate in a virtual consultation, webinar, or event hosted by us, recordings may be made for documentation or training purposes. You will be informed in advance, and recordings will not be shared publicly without your consent.

### **36. Client Testimonials**

When clients provide feedback or testimonials, we may request permission to publish their statements on our website or marketing material. Personal identifiers (such as names or photos) will only be used with your explicit written consent.

### **37. Governing Law**

This Privacy Policy is governed by and interpreted in accordance with the laws of the Republic of Kenya. Any disputes arising under this policy shall be settled in Kenyan courts or appropriate administrative bodies.

### **38. Complaints and Disputes**

If you believe your personal data has been handled inappropriately, you may file a complaint by contacting us directly or writing to the Office of the Data Protection Commissioner (ODPC) in Kenya. We take all complaints seriously and will respond promptly.

### **39. Client Confidentiality**

Client data is handled with the strictest confidentiality, especially due to the sensitive nature of immigration and registration documents. All staff members are bound by confidentiality agreements and disciplinary action will be taken for breaches.

### **40. Right to Restrict Processing**

You may request that we limit the way we use your personal data in certain circumstances, for instance when you contest the accuracy of the data. We will honor your request where legally permissible.



## **41. Legacy Data**

For clients whose services were handled before the enactment of this Privacy Policy, we assure you that your data will be reviewed under the current policy framework and protected accordingly.

## **42. Contact Us**

If you have any questions about this Privacy Policy, how we handle data, or would like to exercise your rights, you can contact our Data Protection Officer via:

- **Email:** [info@writingpadsolutions.com](mailto:info@writingpadsolutions.com)
- **Phone:** +254 723 221941
- **Mail:** P.O. Box (to be updated), Nairobi, Kenya