



# Health Professions Insider Privacy Policy

Effective Date: 27<sup>th</sup> May 2025

HPI | [www.healthpi.co.ke](http://www.healthpi.co.ke) | Nairobi | Kenya

## **Introduction**

Health Professions Insider Ltd., HPI (including direct and indirect subsidiaries) respects your privacy and is committed to protecting your data. This data protection policy (and any other document referred to in it) sets out the basis on which any data we collect from you, that you provide to us, or that is otherwise made available to us, will be processed by us.

This Privacy Policy will inform you as to how we look after your data when you have a membership with us, use our products or services, or visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please read the following carefully to understand our views and practices regarding your data and how we will treat it.

This Privacy Policy may be amended or updated from time to time to reflect changes in our practices with respect to the processing of data, or changes in applicable law. It is important that you read this Privacy Policy together with our Terms and Conditions, and any other policies and notices we may provide on specific occasions when we are collecting or processing data about you so that you are fully aware of how and why we are using your data.

This Privacy Policy supplements other notices and related policies and is not intended to override them.

## Contents

Introduction .....	2
Definitions and Interpretation .....	4
The Data we Collect .....	5
How your Personal Data is Collected .....	6
How we Use your Personal Data .....	7
Marketing .....	10
How We Use “Cookies” On Our Website.....	11
The Use of Hyperlinks .....	11
Change of Purpose.....	12
Disclosure of Personal Information .....	12
Transfer of Your Personal Data Outside Kenya.....	13
How We Keep Your Information Secure.....	13
How Long We Shall Retain Your Personal Data .....	14
Data Subject’s Rights .....	14
Collection of Personal Data on Children.....	15
Internal Complaint Handling Procedure .....	16
Non-compliance With the Data Protection Policy.....	16
Changes To This Data Protection Policy .....	16
How To Contact Us .....	17

## Definitions and Interpretation

For the purposes of this Privacy Policy, the following definitions apply:

- “Applicable Law” means the Constitution of the Republic of Kenya, all Acts of Parliament including regulations, rules, guidelines, guidance notes issued pursuant to any Act of Parliament, legislative and regulatory requirements, and codes of practice applicable to the processing of data and/or applicable to a data controller or data processor as may be amended from time to time;
- “Personal Data” means any information relating to an identified or identifiable natural person (hereinafter “Data Subject”). For clarity, an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, economic, cultural, or social identity of such a natural person.
- “Controller” means the natural or legal person, authority, organization or other agency that makes decisions individually or together with other parties regarding the purposes and means for processing data;
- “Health Professions Insider Ltd.” includes all the subsidiaries and affiliates of Health Professions Insider Ltd.” (Hereafter referred to as “HPI”, “we”, “us” or “our”);
- “Processing” means an operation or activity or set of operations or activities performed on data whether by automated means;
- “Processor” is a natural or legal person, authority, organization or other agency that processes Personal Data on behalf of the Controller.
- “Sub-processor” is the contractual partner of the Processor, engaged to carry out specific processing activities on behalf of the Processor;
- “Third Party” means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor, Sub-processor, and persons who, under the direct authority of the Controller, Processor or Sub-processor, are authorized to process Personal Data;
- “Website” means the website of HPI which is accessible through [\[healthpi.co.ke\]](http://healthpi.co.ke);
- “Online and Web Services” means the services we offer on our online and website platforms;

In addition to the definitions above, unless the context requires otherwise:

- Definitions of terms in our general terms and conditions shall be applicable to this Policy;
- The singular shall include the plural and vice versa; and
- A reference to any one gender, whether masculine, feminine or neuter, includes the other; and

- All the headings and sub-headings in this policy are for convenience only and are not to be taken into account for the purpose of interpreting it.

## **The Data we Collect**

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped as follows:

- Identity data which includes name, username or similar identifier, Identity card/Passport number, PIN number, photo, marital status, family details including nationality, ethnic or social origin, colour, age, title, date of birth and gender, and any other similar information;
- Contact data which includes billing address, postal address, physical address, email address and telephone numbers;
- Financial data which includes any bank account details, card payment details and other electronic or non-electronic payment details;
- Transaction data which includes details about payments to and from you and other details of products and services you have acquired from us;
- Technical data which includes your login identity data, browser type and version, time zone setting and location, browser plug-in types and versions, device information, operating system and platform, and other technology on the devices you use to access our systems;
- Profile data which includes your profile identification information, purchases or orders made by you, preferences, feedback and survey responses;
- Usage data which includes information about how you use our website, products and services;
- Marketing and communications data which includes your preferences in receiving marketing information from us and our third parties and your communication preferences;
- Employment information such as employment history and educational background.

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data could be derived from your data but is not considered data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your data so that it can directly or indirectly identify you, we treat the combined data as data which will be used in accordance with this Privacy Policy.

Minor's personal information is not collected/processed unless with the consent of a legal guardian or parent.

## How your Personal Data is Collected

We will collect and process data about you from the following sources:

- Information you give us: This is information about you that you give us by filling in forms that we give to you (online or physically) or by corresponding with us by phone, e-mail or otherwise. We use different methods to collect data from and about you including through direct interactions. This includes the data you provide when you apply for or use our products or services;
  - Subscribe for a membership or any of our services;
  - Subscribe to our communications or publications;
  - Request service offered information to be sent to you;
  - Enter a competition, promotion or survey;
  - Give us feedback or contact us;
  - Use HPI guest/ visitor's Wi-Fi on our premises; or
  - Pay using our services.
- Information we collect about you: With regard to each of your user visits to our Website and your use of the Online and Offline Services we will automatically collect the following information:
  - Technical information, including the Internet protocol (IP) address used to connect your computer or mobile phone to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies;
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our client service number; and
- Information we receive from other sources:
  - We receive your Personal Data from third parties who provide it to us. We will receive
    - Personal Data about you from various third parties to whom you have consented and public sources including but not limited to: companies registry, lands registry and other government registries; service

- providers we interact or integrate with now or in the future; Integrated Personal Registration Systems,
- We may collect information about you from other publicly accessible sources not listed above. We may also collect information about you from trusted partners, not listed above, who provide us with information about potential clients of our products and services;
  - We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s) to the extent that you choose to make your profile publicly visible.
- Our website may include links to third-party websites, plug-ins, cookies and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites or influence the data collected and are not responsible for their privacy policies. When you leave our website, we encourage you to read the Privacy Policy of every website you visit and understand your rights therein.
  - When you visit one of our offices or facilities (hereinafter premises), your image may be captured via one or more closed-circuit television (CCTV) cameras located within the premises. These images are collected mainly to help us address security issues. The images may be used in the event of an incident occurring in one of our premises and may help to clarify what happened. Our use of CCTV relies on the lawful basis of legitimate interest to prevent crime and protect our employees, users/clients.
  - It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your data changes during your relationship with us. If case, you wish to correct or update your Personal Data that we hold, you may do so by visiting us at any of our branches or writing to us at [info@healthpi.co.ke](mailto:info@healthpi.co.ke)

## **How we Use your Personal Data**

We will only use your Personal Data where we have your consent or a legal basis to process the same.

Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to undertake certain processes in order to enter an agreement with you, and where we need to perform the agreement, we have entered with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate Interest

means the interest of our business in conducting and managing our business to enable us to give you the best service or product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your data for our legitimate interests; and/or

- Where we need to comply with a legal obligation.

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data and the basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data.

How we use your Personal Data	Lawful Basis for Processing Your Personal Data
<b>Registration and On-boarding</b>	<ul style="list-style-type: none"> <li>▪ Compliance with a legal obligation</li> <li>▪ Processing is necessary for the performance of our contractual obligations to you or to take steps to enter into an agreement with you.</li> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> <li>▪ We have obtained your prior consent to the use and processing of your Personal Data.</li> </ul>
<b>Provision of the Health Services (including processing your data, transactions and operation of subscriptions)</b>	<ul style="list-style-type: none"> <li>▪ Compliance with a legal obligation</li> <li>▪ Processing is necessary for the performance of our contractual obligations to you.</li> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> </ul>
<b>KYC, Fraud and Crime Prevention</b>	<ul style="list-style-type: none"> <li>▪ Compliance with a legal obligation</li> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> </ul>
<b>Business Operation and Maintenance (including operation of the HPI's website and other platforms, troubleshooting, incident management, data analysis, product and system testing, system maintenance, support, reporting etc.)</b>	<ul style="list-style-type: none"> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> </ul>
<b>Client Relationship Management (including notifying the client about</b>	<ul style="list-style-type: none"> <li>▪ Processing is necessary for the performance of our contractual</li> </ul>

<p>their use of the subscribed products and services and any changes to applicable Terms and Conditions; responding to client's enquiries, correspondence, technical support requests and complaints handling etc.)</p>	<p>obligations to you or to take steps to enter into an agreement with you.</p> <ul style="list-style-type: none"> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> <li>▪ We have obtained your prior consent to the use and processing of your Personal Data.</li> </ul>
<p><b>Business Development (including data analytics to improve our website, API, products, services, clients relationships and experiences etc.)</b></p>	<ul style="list-style-type: none"> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> <li>▪ We have obtained your prior consent to the use and processing of your Personal Data.</li> </ul>
<p><b>Business Management (including preparing financial records, audits, testing, compliance with our regulatory reporting and other corporate governance requirements.</b></p>	<ul style="list-style-type: none"> <li>▪ Compliance with a legal obligation.</li> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> </ul>
<p><b>Marketing (including marketing of our products &amp; services and recommendations of other products &amp; services, promotions, campaigns etc.)</b></p>	<ul style="list-style-type: none"> <li>▪ Our legitimate interests in operating our business and providing health services to you.</li> <li>▪ We have obtained your prior consent to the use and processing of your Personal Data.</li> </ul>

We may collect special categories of Personal Data about you (this includes details about your race or ethnicity, trade union membership, next of kin or family details, information about your health, criminal convictions and offences and biometric data.)

How we use your special category data	Basis for processing your special category data
<p><b>For Know Your Customer (KYC) formalities;</b></p> <p><b>To carry out verification checks;</b></p> <p><b>To detect, monitor, investigate and report fraud and criminal activity;</b></p> <p><b>To manage security, risk and crime prevention for us and our clients by way of ongoing due diligence, monitoring and screening.</b></p>	<ul style="list-style-type: none"> <li>▪ We have obtained your prior consent to the use and processing of your special category data.</li> <li>▪ We have a legitimate interest in carrying out the processing for the purpose of providing products and services to you.</li> <li>▪ We have obtained your prior consent to the use and processing of your Personal Data.</li> <li>▪ The processing of the special category data is vital in protecting public interests.</li> </ul>

<p><b>We may use your medical information to manage our services and products to you e.g. to apply for quotations for an insurance product, postpone your subscription repayments etc.</b></p>	<ul style="list-style-type: none"> <li>▪ The processing of the special category data is vital in protecting public interests.</li> <li>▪ The processing is necessary to protect the vital interests of any individual.</li> <li>▪ We have obtained your prior consent to the use and processing of your special category data.</li> </ul>

## **Marketing**

We strive to provide you with choices regarding certain data uses, particularly around marketing and advertising. We have established the following data control mechanisms;

- **Promotional offers from us:** We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant to you. You will receive marketing communication from us if you have requested information or used our products and services and have not opted out of receiving such information.
- **Third-party marketing:** we may share your Personal Data with any third party for marketing purposes where we believe that the marketing information from such third parties will be relevant to you and where we have obtained your prior consent.

### **Opting Out**

- You can ask us or third parties to stop sending you marketing messages at any time by writing to us or logging into the relevant website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time through the provided contacts.
- Where you opt-out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of product or service subscribed to, warranty registration, product or service experience or other engagements.

## **How We Use “Cookies” On Our Website**

We may place electronic “cookies” in the browser files of your computer when you access our Website. Cookies are pieces of information that our website transfers to your computer to enable our systems to recognize your browser and to tailor the information on our Website to your interests. For example, if you previously visited our Website and inquired about particular services over the Website, cookies enable us to present information tailored to your subscription and/or those particular interests the next time you visit the Website.

Moreover, we, or our third-party service providers or business partners may place cookies on your computer’s hard drive that can be matched to other personal information we maintain about you to pre-populate certain online forms for your convenience. We also use cookies to analyse visitors’ use of our Website. This analysis helps us better understand which areas of our sites are most useful and popular, to enable us to plan improvements and updates accordingly.

Many web browsers are automatically set to accept cookies. You may change your computer’s web browser settings to either reject cookies or notify you when a cookie is about to be placed on your computer. Please note, however, that rejecting cookies while visiting our Website may result in certain parts of the website not operating as efficiently as if the cookies were allowed. Please refer to our Cookie Policy for more details.

## **The Use of Hyperlinks**

Other URLs may be referenced through hyperlinks on our website. Clicking on these links may open webpages operated by third parties not associated with us. These hyperlinks are for the dissemination of information and for you to have a good user experience.

By clicking on a hyperlink, you will leave the HPI webpage and accordingly, you shall be subject to the terms of use, privacy and cookie policies of the other website that you choose to visit. By navigating to an externally linked website on the HPI webpage, you will be exiting our website and you will be exposed to new terms of use, privacy policy and cookie policies of the website you have visited. We do not in any way promote, recommend, endorse, guarantee or approve third-party products and services offered through hyperlinks for external web pages. Material or content found in hyperlinks for external websites is not in our control and data processing is in accordance with their Privacy Policy.

## **Change of Purpose**

We will only use your Personal Data and special category data for the purposes for which we collected it as indicated in this Privacy Policy or for reasons we give you during the collection of the data.

If we need to use your Personal Data for an unrelated purpose, we will notify you and seek your consent where necessary. Please note that we may process your Personal Data without your knowledge or consent if this is required or permitted by law.

## **Disclosure of Personal Information**

We may disclose your Personal Data to other entities, the affiliates of HPI, for legitimate business purposes (including providing services to you and operating our sites and systems), in accordance with applicable law. In addition, we may disclose your

Personal Data to:

- Government (including law enforcement) authorities and regulators e.g. Kenya Revenue Authority, Ministry of Health;
- Other health institutions through which your data is processed;
- Other health and financial institutions that we work with to provide services to you e.g. Credit card service providers, technology service providers, credit reference bureaus, employers, debt collection agencies and outsourced services vendors; fraud prevention/detection, private investigators, agencies tasked with conducting surveys on behalf of HPI group;
- Third parties with accruing legal obligations e.g. Trustees and executors, guarantors, anyone holding a power of attorney to operate a subscription on your behalf and that of the sc=subscription beneficiaries holders;
- Third parties who are service providers acting as health service providers, processors, and professional advisers including doctors, Pharmacists, and those who provide consultancy, medical, legal, and insurance services.
- Restricted or publicly accessible government repository as a verification procedure in compliance with regulations.
- Regulatory authorities, police or security agencies, courts of law or statutory authorities in response to litigation and demand issued on legal/regulatory grounds in accordance to the law.

- Agencies tasked with conducting surveys on behalf of HPI Emergency and disaster response providers in cases where a person's health and safety is at stake when an emergency call is made.
- Persons involved in delivering HPI products and services you use or order.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

### **Transfer of Your Personal Data Outside Kenya**

- We may need to transfer or store your information in another jurisdiction to fulfil a legal obligation, for our legitimate interest and to protect the public interest.
- Insofar as is required for providing our services, we use third-party service providers who are located outside Kenya or store your information (including your sensitive data) outside Kenya.
- When we, or our permitted third parties transfer or store information outside Kenya, we or they will ensure that it is lawful and that it has an appropriate level of protection, including transfer to jurisdictions that have established data protection laws, and entering legally binding agreements to ensure the security of your Personal Data.
- Where your information is transferred to affiliates of HPI in other countries, we ensure that your Personal Data is protected by requiring that they follow the same rules when processing your Personal Data.
- We may also transfer your information across country borders where you have consented to the transfer.
- If we transfer your information outside Kenya in other circumstances (for example, because we have to provide such information by law), we will use best endeavours to put on place appropriate safeguards to ensure that your information remains adequately protected.

### **How We Keep Your Information Secure**

- We have put in place appropriate security measures to prevent your Personal Data from being lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors

and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

- We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **How Long We Shall Retain Your Personal Data**

- We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.
- To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- By law we have to keep basic information about our clients (including contact, identity, financial and transaction data) for a minimum of seven years after they cease being clients. Our internal policy as amended from time to time may also require us to keep client's data for a longer period.
- In some circumstances, we will anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **Data Subject's Rights**

Subject to legal and contractual exceptions, you have rights under applicable laws in relation to your Personal Data. These are listed below:

- Right to be informed that we are collecting your personal information and how we are processing it;
- Right to rectify your data where it is inaccurate or incomplete;
- Right to withdraw your consent to the processing of your data. However, we may continue processing your data for legitimate interests or legal grounds;
- Right to object to processing of all or part of your data. However, we may decline your request if we are obliged by law or entitled to do so; Right of erasure of your data held by us, noting that we may continue to retain your information if we are entitled to do so or obliged by law; Right to access your data in our possession;

- Right to not be subjected to profiling or automated decision making in regard to processing of your Personal Data. However, we may decline your request if we are obliged by law or entitled to do so;
- Right to request your data to be processed in a restricted manner. Note that we may continue processing data and reject the request if we are entitled to or are legally obliged;
- Right to data portability in a manner we may deem appropriate such as electronic format;

Exercising Your Data Protection Rights: We are committed to ensuring that you can easily exercise your data protection rights in compliance with applicable regulations. To exercise any of the above rights you can make a request through the [Contact Us](#) page on the website, by populating and submitting to us the Data Subject Rights Request Form that can be downloaded from [Here](#), or by contacting our Data Protection Officer (DPO) using the contact details provided in this Policy. If you believe that we have not adequately addressed your data protection concerns, you have the right to lodge a complaint with the appropriate regulatory authority. Our Data Protection Officer will guide you through the complaint process.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). 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.

We try to respond to all legitimate requests within reasonable time. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Collection of Personal Data on Children**

Protecting the privacy of children is of utmost importance to us. HPI recognizes that processing children's data carries inherent risks due to its sensitive nature, hence the need for heightened protection. As minors lack the legal capacity to provide informed consent and are vulnerable to identity theft, fraud and exploitation, HPI has implemented robust safeguards to ensure children's privacy and data security.

At HPI, we only process data relating to children as provided by their parents or legal guardians. We acknowledge the importance of parents' and legal guardians' consent and supervision in children-related health needs and therefore require that they provide their signature as authorization and/or consent for the use of minors' details for the provision of the HPI's products and services, or involvement in HPI's activities.

If you believe that we have inadvertently collected Personal Data relating to a minor, please contact our Data Protection Officer (DPO) using the provided contact details.

### **Internal Complaint Handling Procedure**

We take data protection seriously and strive to address any concerns promptly and effectively. If you have concerns regarding the handling of your Personal Data, you can reach out to our Data Protection Officer (DPO) using the contact details provided in this Policy.

Upon receiving your complaint, our DPO will initiate an internal review process to investigate and resolve the issue. We will respond to your questions or concerns within seven (7) days of receipt. If you are dissatisfied with the outcome of our internal resolution process, you have the right to escalate your complaint to the appropriate regulatory authority.

### **Non-compliance With the Data Protection Policy**

HPI reserves the right to discontinue any agreement in case of compliance failure for the provisions in this Privacy Policy and decline any application for information that contradicts this Privacy Policy.

### **Changes To This Data Protection Policy**

A copy of this policy can be downloaded [Here](#). We may modify or update this policy from time to time. Where the changes will have a fundamental impact on the nature of the processing of your data or your rights, we shall notify you in advance.

## How To Contact Us

In case you would like to contact us with reference to the terms of this privacy policy, or in order to exercise any of your rights in relation to your Personal Data, you can reach us through the below contacts.

### Health Professions Insider

[Address]

Email : [info@healthpi.co.ke](mailto:info@healthpi.co.ke)

Phone: +254 116 000 007 | +254 116 000 009

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