

# PRIVACY POLICY

Effective Date: 1 January 2026  
KILIMORA CLG

**Business Function:** Privacy

**Relevant Teams:** All Staff, Volunteers, Partners

**Original Author:** Strategic Operations and Product Lead

## 1. About This Policy

Kilimora Company Limited by Guarantee ("Kilimora", "we", "us", "our") is a social enterprise building research and product development solutions that use emerging technology to bridge the gap between youth and women-led SMEs and global climate finance. We are committed to protecting the privacy of every person whose data we collect and process. This includes smallholder farmers enrolled on the AgriKonnekt platform, cooperative partners, institutional buyers, development finance institutions, research partners, donors, website visitors, and any other individual who interacts with our organisation.

This policy explains what personal data we collect, why we collect it, how we use and protect it, and what rights you have over your information. We process personal data in compliance with the Kenya Data Protection Act 2019 and, where applicable, international data protection standards including the General Data Protection Regulation.

## 2. Key Definitions

**Personal data** means any information relating to an identified or identifiable natural person. This includes names, phone numbers, location data, biometric identifiers, financial account details, and environmental data linked to a specific individual or household.

**Processing** means any operation performed on personal data, including collection, recording, storage, use, disclosure, or deletion.

**Data controller** means the party that determines the purposes and means of processing personal data. For all processing described in this policy, the data controller is Kilimora Company Limited by Guarantee.

**Data subject** means the individual to whom the personal data relates.

**Farmer data** means environmental, agronomic, and financial data collected from enrolled smallholder farmers through the AgriKonnekt platform, including MRV verification records, soil sensor readings, satellite-linked land use data, and mobile money transaction records.

## 3. What Data We Collect and Why

Kilimora collects data strictly for defined operational purposes.

Farmer and cooperative data includes identity, contact details, farm location, land use, and payment information. This supports platform participation, verification of agricultural practices, payments, and market access. Processing is based on consent and remains active for the participation period plus up to seven years for audit and compliance.

Environmental data includes soil conditions, land use changes, biodiversity indicators, and verification records. This supports environmental outcome measurement, reporting, and climate finance participation. Processing is based on consent and may be retained for up to ten years to meet verification and registry requirements.

Financial transaction data includes payment references, amounts, and timestamps. This supports payment processing and financial accountability. Processing is based on contractual necessity and retained for up to seven years.

Partner and institutional data includes organisation details and professional contacts. This supports partnership management, transactions, and collaboration. Processing is based on legitimate interest and retained for the duration of the relationship plus up to three years.

Research data includes collaborator identities and affiliations. This supports joint research and policy development. Retention may extend up to five years after project completion.

Website and communication data includes device information, usage patterns, and contact details submitted through communication channels. This supports platform functionality and user engagement. Retention is limited, typically under two years.

Application data includes personal and professional details submitted for roles or opportunities. This is processed based on consent and retained for up to two years.

### 4. How We Share Data

Kilimora does not sell personal data. Data is shared only when necessary to deliver services or meet legal obligations.

This includes sharing with verification bodies, financial service providers, research collaborators, and institutional partners. Where possible, data is aggregated or anonymised. Personally identifiable data is shared only with consent or when required for transactions or compliance.

### 5. Data Security

Kilimora applies structured safeguards to reduce risk exposure. These include encryption, controlled access, and system design that limits unnecessary data transfer. Security controls are reviewed regularly. No system is fully immune to risk, but mitigation measures are actively enforced.

### 6. Your Rights

Individuals have defined rights over their data. These include access, correction, deletion, restriction, portability, and objection to processing. Consent may be withdrawn at any time where applicable. Requests are processed within 21 days upon verification of identity.

### 7. Community Data Principles

Kilimora operates on a custodial model. Data originates from individuals and communities and is not treated as a proprietary asset. Data is used only for defined purposes. Additional use requires renewed consent. Individuals may request access to their full data records at any time. More than 60 percent of participants in Kilimora supported systems are women receiving direct financial benefits. Data governance is structured to protect economic agency and prevent misuse.

## 10. Policy Updates

This policy may be revised to reflect operational or regulatory changes. Continued engagement with Kilimora services indicates acceptance of the updated terms. Material updates will be communicated through appropriate channels.

## 11. Complaints

Concerns regarding data handling may be directed to Kilimora through the provided contact channels. Resolution is targeted within 30 days. Individuals also retain the right to lodge complaints with the relevant regulatory authority in Kenya.

## 12. Contact Information

Kilimora Company Limited by Guarantee

Nairobi, Kenya

Email: [hello@kilimora.africa](mailto:hello@kilimora.africa)

Phone: +254 103 900 367

Data protection enquiries should include the subject line *Data Protection Enquiry*.