

## **Social Health Authority Privacy Policy**

### **Introduction and Policy Statement**

The Social Health Authority Platform (hereafter “Social Health Authority Platform” or “us/ we”) is a digital platform through which the Government of Kenya shall enable registration of citizens, residents and refugees for access to Social Health Insurance. Social Health Authority relies on official Government Records to verify any personal data submitted by you while seeking services. This kind of data relates to official names, Identity Card Numbers, Passport Numbers, KRA PIN Numbers and so on.

Social Health Authority Platform is committed to keeping your personal data secure, this relates both to data submitted by you while accessing Government Services through Social Health Authority and any data available to us from the official records kept by the Government of Kenya. Any data you are required to submit or that is collected by us is either necessary to provide the service you are seeking, sought in order to improve service delivery or collected as mandated by law in order to provide the service you are seeking.

We are cognizant of the fact that the personal data in our possession is personal to you and a part of your property and identity. We shall not use the personal data in any way other than what is contained in this privacy policy.

In handling your personal data, we shall be guided by the precepts of the Constitution of Kenya, the Data Protection Act, 2019, the Digital Health Act, No. 15 of 2023 and any other regulatory or policy document published by the Government of Kenya.

### **Consent to Collect Personal Data**

In accessing any Government Services through the Social Health Authority Platform, you will give tacit consent to us collecting data as per the precepts laid out in this Privacy Policy. You are therefore advised to read through the Privacy Policy and raise any questions you may have about it with our Customer Care team. You are also advised that the Privacy Policy may be amended from time to time and you may therefore need to check for any updates on the policy.

The Data Protection Act, 2019 provides you with the right: to be informed of the use to which your personal data is to be put; to access your personal data in our custody; to object to the processing of all or part of your personal data; to the correction of false or misleading data; and to deletion of false or misleading data about you. Our policy aims to ensure that you are able to exercise all your rights.

### **The Data we Collect**

We collect data in order to open your account. This will include your contact information and Identity Card Number. These will allow you access to your Social Health Authority Profile from which you can access government services. It also allows us to verify your identity from official government records to ensure that the person accessing your profile is actually you.

We will in certain instances require you to input your name, identity card number and passport photograph or the name and identity card number and passport photograph of a person for whom you are carrying out a service such as incorporating a Company.

In most instances we collect the data because various laws mandate that such information is necessary before a service can be provided. Before applying for a government service where it is allowed to make the application on behalf of another person it is important to obtain the consent of the other person to submitting the data to Social Health Authority.

In order to access certain services, we will require contact information about you including your telephone number, email address, postal address, and residential address. These are required in order for you to be granted certain government services as it may be important to contact you in relation to the offer of such services or as a consequence of having received such services. This information will also update the government repository of official data about you.

We will also collect your Internet Protocol Address and details of which web browser you use. We will also collect cookies relating to your website use. This is done in order to improve the service of the Social Health Authority Platform to you by, for instance making it more accessible to a web browser that we notice many clients are using to access the Social Health Authority Platform.

When communicating with customer care you will be required to give information relating to your identity, your Social Health Authority Profile, and the reference number from which your issue relates. This is so that we can ensure that our Customer Care team is able to tend to your needs.

### **How we use your Information**

Your information is used to:

- Allow you to register for and access services.
- Verify your identity from official Government Records.
- Communicate with you in the event specific or personalized information is needed from you.
- Monitor use of the site to identify potential security threats.
- Monitor performance of the site in order to improve service delivery to you.
- Enable our customer care team to properly serve you.
- Carry out research and collect information on population trends important to the Government for its policy making.

### **Our Legal Basis for collecting information**

We will only collect information from you if:

- You give consent for the collecting of the information.
- We require it in order to provide government services to you.
- It is needed to perform a task in the public interest.

We are a pathway for access to services provided by various Government Ministries, Departments, and Agencies as well as County Governments. Various Government Ministries, Departments and Agencies will have a legal justification for collecting your data based on their enacting enabling legislation. We will collect data on behalf of these Government Ministries, Departments, and Agencies and submit it to them to provide the services to you.

### **Who may receive your data**

We may share your data with relevant government departments in order to enable them provide the service to you and in order to update official government records about you.

We may share your personal data if compelled to do so by the precepts of any law, court order, or other legal obligation to the Government of Kenya.

We may share your information with third party service providers but only to the extent necessary for them to provide a necessary service to us and after making sure we have the necessary contractual safeguards to ensure that your data will be protected in the same manner that we would protect it.

Under no circumstances will we sell or rent your data to third parties for any purpose whatsoever.

No information that you provide to us will be used to market any product or service to you.

### **Data Retention**

We will only retain your data for as long as is necessary as mandated by any law provided that in the case of official government records the data will be stored for retrieval and reference by government departments.

We will keep your email data as long as you maintain a Social Health Authority Profile

We will keep your feedback data for two years.

We will retain access log data including your IP address for a period of 7 days

### **Data Protection**

We have set up internal systems and processes to ensure that your data is protected. Our cybersecurity protocol is constantly tested and updated to keep up with the latest developments in the field and to ensure that all potential threats are addressed before becoming a reality.

Varying levels of encryption are applied to your data and access control is given in a manner that only allows people who need your data for official purposes such as providing a service access to it.

### **Correction or Deletion of Personal Data**

You have the right to correct or delete any personal data that may be collected about you. Note that for any personal data that is a part of official Government Records the process for correction or deletion of that personal data is subject to the laws under which the Government collects or stores the data and you will be required to follow the legal procedure laid out in such laws to effect the changes you desire.

You can access all personal data that you have submitted in order to open and operate your account under your "My Account" page in the Social Health Authority Profile. Any corrections made will require you to input your password.

### **Customer care**

If you have any issue in regards to your privacy or how your personal data has been handled you can contact us on the telephone number 020 2723255/6, 2723246, 271 4793/94, 2722527 on the email address [info@sha.go.ke](mailto:info@sha.go.ke)

### **Changes to the Policy**

The Policy may be updated from time to time in line with changes in law and best practices on data protection around the world. In the event that this happens the date on which the policy is updated will also change to enable you confirm when changes are made.

This Policy was last updated on 1<sup>st</sup> June, 2024