

NYERI WATER AND SANITATION COMPANY LIMITED



PRIVACY POLICY

1. INTRODUCTION

Nyeri Water and Sanitation Company Limited (NYEWASCO) is committed to protecting the privacy and confidentiality of personal information entrusted to us by our customers, prospective customers, suppliers, contractors, development partners, regulators, visitors, website users and other stakeholders. This Privacy Policy explains how we collect, use, disclose, store and protect personal data whenever you interact with NYEWASCO through our offices, website, social media platforms, telephone, email, field operations or any other official channel. We process personal data in accordance with the Constitution of Kenya, the Data Protection Act, 2019 and applicable regulations.

2. SCOPE

This Policy applies to personal data collected through customer service centres, the website, online forms, email, telephone, social media, field visits, service applications, supplier engagements, stakeholder forums, public participation meetings, events, CCTV and any other official interaction with NYEWASCO.

3. PERSONAL DATA WE COLLECT

We may collect names, identification details, contact information, physical and postal addresses, account and meter numbers, property information relevant to service delivery, billing and payment information, complaints and enquiries, correspondence, photographs, videos, audio recordings, CCTV footage and technical information such as IP address, browser type and website usage information.

4. How We Collect Personal Data

How We Collect Your Personal Data	Personal Data Collected
Customer Application Forms (e.g. New Water Connection, Sewer Connection and other service application forms)	Name, mobile number, email address, National ID/Passport Number, KRA PIN (where applicable), postal and physical address, plot number, house/door number, property ownership or occupancy details, passport-size photograph (where required), and supporting documents.
Telephone Calls, Email and Social Media	Name, contact details, and any information voluntarily provided through these communication channels.

How We Collect Your Personal Data	Personal Data Collected
Stakeholder Engagements, Public Participation Forums and Company Events	Name, organization, contact details, Email address and where applicable, photographs, video recordings and audio recordings captured during official Company events, meetings, training sessions, project launches and stakeholder engagement activities.
CCTV Cameras at NYEWASCO Offices and Premises	CCTV images and video footage captured for the safety and security of customers, employees, visitors and Company property.

5. Why We Use Your Information

We use personal data to provide water and sanitation services, process applications, manage customer accounts, issue bills, receive payments, respond to enquiries and complaints, communicate service interruptions, improve our services, conduct stakeholder engagement, comply with legal obligations, prevent fraud, protect our people and property and document Company activities.

6. Legal Basis

We process personal data where you have consented, where processing is necessary to provide requested services, comply with legal obligations, perform a public function or pursue legitimate interests that do not override your rights.

7. Photography, Video and Audio

NYEWASCO may take photographs, videos and audio recordings during official events, stakeholder engagements, public participation forums, trainings, CSR activities, project launches and other Company functions. These may be used for corporate communications, annual reports, newsletters, media releases, the Company's website and official social media platforms. Where required by law, consent will be sought. Individuals who prefer not to appear in recordings should notify event organisers where reasonably practicable.

8. CCTV

Selected NYEWASCO premises are monitored by CCTV for safety, security, crime prevention and incident investigation. Recordings are retained only as long as necessary or as required by law.

9. Sharing

We do not sell personal data. We may share it with regulators, government agencies, payment providers, technology providers, auditors, professional advisers and law enforcement where required by law or to provide our services.

10. Security

We implement appropriate technical, physical and organizational safeguards to protect personal data against unauthorized access, alteration, disclosure or loss.

11. Retention

Personal data is retained only for as long as necessary to fulfil the purpose for which it was collected or as required by law, after which it is securely deleted, destroyed or anonymized.

CATEGORY OF PERSONAL DATA	PURPOSE	INDICATIVE RETENTION PERIOD
Customer account and service records	Provision of water and sanitation services	Duration of the customer relationship and at least seven (7) years thereafter, or as required by law
Billing, payment and financial records	Accounting, audit and tax compliance	At least seven (7) years or such longer period as required by law
Customer complaints and enquiries	Complaint handling, quality assurance and dispute resolution	Seven (7) years after resolution
Water and sewer service application records	Service administration and verification	Seven (7) years after closure or rejection of the application
Supplier, contractor and consultant records	Procurement, contract management and audit	Seven (7) years after expiry or termination of the contract, or as required by law
Employee recruitment records (unsuccessful applicants)	Recruitment administration	Two (2) years after conclusion of the recruitment process unless consent for longer retention is obtained.

CCTV footage	Security, safety and incident investigation	Up to ninety (90) days unless required for investigations, legal proceedings or regulatory purposes.
Photographs, videos and audio recordings	Corporate communication, publicity and historical records	Until no longer required for the purpose collected, unless retained for archival, historical or legal purposes.
Website logs and technical information	Website security, analytics and system administration	Retained in accordance with NYEWASCO's Records Management Policy and ICT governance requirements for operational, security, audit and legal purposes.

12. Deletion of Personal Data

NYEWASCO shall securely delete, destroy or anonymize personal data when it is no longer required for the purpose for which it was collected, where the applicable retention period has expired, or where a valid request for deletion has been made by a data subject and no lawful basis exists for continued retention. Requests for deletion shall be considered in accordance with the Data Protection Act, 2019 and applicable regulations.

NYEWASCO may refuse or defer a request for deletion where continued retention of the personal data is necessary to:

- comply with a legal or regulatory obligation;
- establish, exercise or defend legal claims;
- investigate or prevent fraud, security incidents or unlawful activities;
- maintain customer account, billing or payment records;
- comply with audit or public record-keeping requirements; or
- fulfil any other lawful purpose permitted under applicable law.

Where deletion is approved, NYEWASCO shall take reasonable measures to permanently remove the personal data from its active systems and, where reasonably practicable, from backup and archived systems within a reasonable period.

12. Cookies

Our website may use cookies and similar technologies to improve functionality, security and user experience. You may manage cookie preferences through your browser settings.

13. Third-Party Websites

Our website may contain links to third-party websites. NYEWASCO is not responsible for their privacy practices and encourages users to review their policies.

14. Your Rights

You have the right to be informed, access your personal data, request correction, request deletion where applicable, object to certain processing, withdraw consent where applicable, request restriction or portability where permitted and lodge a complaint with the Office of the Data Protection Commissioner. The exercise of any data subject right shall be subject to the limitations and exemptions provided under the Data Protection Act, 2019 and any other applicable law.

15. Changes

We may update this Policy from time to time. The latest version will be published on our website with the effective date.

16. Contact Us

Nyeri Water and Sanitation Company Limited (NYEWASCO)

P.O. Box 1520-10100, Nyeri

Email: info@nyewasco.co.ke

Telephone: 0800 721 095 | +254 734 732 481 | +254 714 430 000

Website: www.nyewasco.co.ke

If you believe your personal data has been handled contrary to this Policy, please contact NYEWASCO.

If you remain dissatisfied, you may lodge a complaint with the Office of the Data Protection Commissioner.



ENG. PETER G. KAHUTHU
MANAGING DIRECTOR.