



KRISTINE REUBEN  
HOME PRODUCTS

# PRIVACY POLICY

**Kristine Reuben Home Products Ltd**  
*(Global Data Protection Compliance)*

Last

Updated:

January

2026

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## 1. Introduction & Scope

Kristine Reuben Home Products Ltd (“KRHP”, “we”, “our”, “us”) is committed to protecting personal data and respecting privacy in accordance with applicable data protection and cybersecurity laws in **Kenya**, and globally including:

- Kenya Data Protection Act, 2019
- African Union Convention on Cyber Security and Personal Data Protection (Malabo Convention)
- EU General Data Protection Regulation (GDPR)
- Applicable United States state privacy laws, including the California Consumer Privacy Act (CCPA/CPRA) and similar state laws

This Privacy Policy applies to all personal data processed by KRHP in connection with the sale and fulfillment of our products, regardless of the customer’s location.

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## 2. Data Roles & Platform Structure

### 2.1 Data Controller

Kristine Reuben Home Products Ltd is the **primary Data Controller** for personal data collected and processed in relation to KRHP products.

### 2.2 Third-Party Platforms

KRHP uses third-party platforms that process personal data under their own privacy policies:



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- **Vendora** – Data Processor for customer listings and order relay; limited Data Controller for platform operations
- **WhatsApp Business** – Independent Data Controller for customer communications
- **M-Pesa** – Independent Data Controller for payment processing
- **Delivery and logistics partners** – Data Processors for delivery purposes only.

KRHP does not control how independent third parties process personal data beyond the scope necessary to provide our services.

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### 3. Personal Data We Collect

KRHP may collect and process the following categories of personal data:

- Identifiers: full name, mobile phone number
- Transactional data: order details, order history
- Communication data: messages exchanged via WhatsApp Business

KRHP **does not collect or store:**

- Payment card data
  - M-Pesa PINs or authentication credentials
  - Banking or financial account details
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### 4. Purpose of Processing

Personal data is processed only for legitimate business purposes, including:

- Order confirmation and fulfilment
- Customer communication and support



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- Record-keeping and internal administration
- Compliance with legal, tax, and regulatory obligations

KRHP does not process personal data for purposes incompatible with those listed above.

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## 5. Legal Basis for Processing

### 5.1 Kenya & Africa

Processing is based on:

- Performance of a contract
- Consent
- Legal obligations
- Legitimate interests pursued by KRHP, balanced against customer rights

### 5.2 European Union (GDPR)

Processing is carried out under Article 6 of the GDPR, including contractual necessity, consent, legal obligation, and legitimate interests.

### 5.3 United States

For US residents, personal data is processed for **business purposes** as defined under applicable state privacy laws. KRHP does not sell personal data or engage in targeted advertising as defined under such laws.

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## 6. Data Sharing & Disclosure

Personal data may be shared only where necessary with:

- Vendors (order processing and relay)



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- Delivery and logistics partners
- Regulatory, law-enforcement, or government authorities where legally required

KRHP **does not sell, rent, trade, or share personal data for cross-context behavioural advertising.**

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## 7. Data Storage & International Transfers

Personal data may be processed or stored on systems located inside or outside Kenya due to the use of third-party platforms.

Where international data transfers occur:

- KRHP relies on appropriate safeguards implemented by third-party platforms
  - Transfers are conducted in accordance with GDPR, Kenyan law, and applicable international data protection standards
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## 8. Data Security & Cyber Protection

In line with the **Malabo Convention**, GDPR, Kenyan law, and recognised international best practices, KRHP implements **reasonable technical and organisational measures** to protect personal data, including:

- Access controls and password-protected systems
- Limited access on a need-to-know basis
- Confidentiality obligations for staff and contractors
- Data minimisation and purpose limitation

While no system can guarantee absolute security, KRHP takes appropriate steps to reduce the risk of unauthorised access, loss, or disclosure.

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## 9. Data Breach Management

In the event of a personal data breach:

- KRHP will assess the breach without undue delay
  - Notifications will be made to affected individuals and relevant authorities where required by applicable law
  - Platform partners will be notified where the breach involves shared systems or data
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## 10. Data Retention

KRHP retains personal data only for as long as reasonably necessary to:

- Fulfil orders
- Comply with legal and tax obligations
- Resolve disputes or customer queries

Data is securely deleted or anonymised once it is no longer required.

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## 11. Individual Rights

### 11.1 Global Rights

Depending on jurisdiction, individuals may have the right to:

- Access personal data
- Request correction or deletion
- Withdraw consent
- Object to or restrict certain processing



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## 11.2 European Union (GDPR)

EU residents additionally have rights to data portability and to lodge complaints with a supervisory authority.

## 11.3 United States

US residents may have the right to:

- Request access to personal data
- Request deletion
- Opt out of sale or sharing (note: KRHP does not sell or share personal data)

Requests can be made through KRHP's official contact channels.

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## 12. Children's Data

KRHP does not knowingly collect or process personal data relating to children under the age of 13 (or equivalent age under applicable law).

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## 13. Policy Updates

KRHP may update this Privacy Policy from time to time to reflect legal, regulatory, or operational changes. Updates take effect upon publication.

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## 14. Governing Law

This Privacy Policy is governed by the laws of the **Republic of Kenya**, without prejudice to mandatory protections available under other applicable data protection laws.