



HOME OF LIGHT & LOVE FOUNDATION

RESTORING HOPE DAILY

lightlovefoundation.org

PRIVACY & SAFEGUARDING POLICY

1. Introduction

Home of Light & Love Foundation ("we", "us", "our") is committed to protecting the personal data of all individuals we interact with — including children in our care, widows, donors, volunteers, staff, and community partners.

This Privacy & Safeguarding Policy sets out how we collect, use, store, and protect personal information in full compliance with the **Kenya Data Protection Act 2019** and international best practices. We treat the privacy of every person we serve with the utmost seriousness and hold ourselves accountable to the highest standards of data stewardship.

2. Data Controller Details

Home of Light & Love Foundation is the registered **Data Controller** responsible for all personal data collected through our programmes, website, and field operations.

Organisation Name	Home of Light & Love Foundation
Location	Baringo, Kenya
General Email	info@lightlovefoundation.org
Privacy / DPO Email	privacy@lightlovefoundation.org
Data Protection Officer	Responsible Officer (appointed internally)

3. Data We Collect

We collect only the personal data necessary to fulfil our charitable mission. This includes the following categories:

Children in Care Names or initials, age, gender, health status, guardian contact details, and school enrolment information.

Donors Full name, email address, phone number, and payment details (processed securely through trusted third-party payment processors).

Volunteers & Staff National ID, contact details, professional qualifications, and emergency contact information.

Website Visitors IP address, browser type, and pages visited (collected via cookies — see Section 15).

Medical Camp Participants Name, age, presenting condition, and treatment provided.

4. Sensitive Data — Medical & Health Information

Certain programmes, particularly our medical camps, require us to collect **special category data**, including health conditions, treatment records, and disability status. We handle this data with the highest level of care:

- Collected only with **explicit written or verbal consent** from the individual or their guardian.
- Stored separately from general personal data, with strictly restricted access.
- Used exclusively for the delivery of medical or care services — **never shared for commercial purposes**.
- Retained only for as long as required by the relevant care programme (see Section 9 for retention periods).

5. How We Collect Data

We collect personal data through the following channels:

Online: Donation forms, contact forms, newsletter sign-ups, and website enquiries.

Field Operations: Paper consent forms completed at medical camps, outreach visits, and community events.

Photography & Media: Only with signed or witnessed consent from the individual or their guardian (see Section 12).

Third Parties: Partner NGOs or referral agencies who share data with the knowledge and consent of the individual concerned.

6. Legal Basis for Processing

We process personal data under the following lawful bases as recognised by the **Kenya Data Protection Act 2019:**

Basis	Application
Consent	The individual has given clear consent (e.g. signing a media consent form or medical camp form).
Legitimate Interest	Processing is necessary to advance our charitable mission.
Legal Obligation	Certain records must be retained as required by law.
Vital Interests	In emergency situations, to protect the life of a child or individual.

7. How We Use Your Data

We use personal data solely for the following purposes:

- Delivering programmes, medical care, and community support services.
- Processing donations and issuing official tax receipts.
- Communicating with donors and volunteers about our work and impact.
- Reporting to regulatory bodies and grant-making partners.
- Improving our website and digital communications.
- Safeguarding children and vulnerable individuals in our care.

We will never use personal data for any purpose beyond what is described in this policy without first seeking your consent.

8. Data Sharing

We never sell, rent, or trade personal data. We may share data only in the following strictly limited circumstances:

Service Providers: Secure payment processors and email platforms, bound by data protection agreements.

Government Authorities: Only when legally required, for example in the case of a mandatory child protection referral.

Partner Organisations: Only with your knowledge and explicit consent, for the purpose of coordinated care delivery.

Auditors & Funders: Anonymised or aggregated data only, for programme reporting and accountability purposes.

9. Data Retention

We retain personal data only for as long as strictly necessary, after which it is securely deleted or anonymised.

Data Category	Retention Period
Donor records	7 years (financial and tax obligations)
Children's case files	Until the child turns 25, or 7 years after last contact
Medical camp records	5 years after the event
Staff and volunteer records	3 years after end of engagement
Website analytics	12 months

10. Your Rights

Under the **Kenya Data Protection Act 2019**, you have the following rights regarding your personal data:

- **Right of Access** — to request a copy of the data we hold about you.
- **Right to Rectification** — to correct any inaccurate or incomplete information.

- **Right to Erasure** — to request deletion of your data where applicable (the "right to be forgotten").
- **Right to Restriction** — to limit certain types of processing of your data.
- **Right to Object** — to object to processing based on legitimate interests.
- **Right to Portability** — to receive your data in a structured, machine-readable format.
- **Right to Withdraw Consent** — at any time, without affecting the lawfulness of past processing.

To exercise any of these rights, please contact us at:

privacy@lightlovefoundation.org

11. Children's Data

We recognise that children require enhanced privacy protection. The following safeguards are in place across all our programmes:

- We will never display the full identity — name combined with face — of a child without prior guardian consent.
- Photos and videos of children are blurred or use initials only where full consent has not been obtained.
- Children's data is processed only under the lawful basis of **vital interests** or **explicit guardian consent**.
- All staff and volunteers working directly with children receive training in child safeguarding procedures.

12. Media & Photography Consent

Home of Light & Love Foundation documents its programmes and activities through photographs, videos, and personal stories. This media may be captured during any Foundation activity, including community outreach, feeding

programmes, educational support, free medical camps, children's events, donor visits, and volunteer engagements.

Before any photograph, video, or personal story is captured or shared publicly, we undertake the following:

- Obtain a **signed or witnessed consent form** from the individual or their legal guardian, clearly explaining how and where the media will be used.
- Give individuals a choice over whether their **full name, initials, or first name only** is used alongside any media.
- Give individuals a choice over whether their media is shared on **public platforms such as social media**, or limited to private reports and presentations only.
- Provide every individual with the right to **withdraw consent** at any time, after which the Foundation will make reasonable efforts to remove the relevant media from future use.
- Ensure media is **never used for commercial advertising** or sold to third parties, and never repurposed beyond what was originally agreed.

A separate **Media & Photography Consent Form** is completed for each individual or, in the case of a minor, their legal guardian.

13. Security Measures

We implement robust technical and organisational safeguards to protect personal data, including:

- **SSL/TLS encryption** on all web forms and donation pages.
- **Restricted access controls** — only authorised staff may view sensitive records.
- **Password-protected and encrypted** digital file storage.
- **Locked physical storage** for all paper-based consent and medical forms.
- **Regular staff training** on data protection, privacy, and safeguarding obligations.

14. Data Breach Handling

In the event of a personal data breach, we will take the following steps without delay:

- i. **Investigate and contain** the breach within **24 hours** of discovery.
- ii. **Notify the Office of the Data Protection Commissioner (ODPC)** within **72 hours** where required by law.
- iii. **Inform affected individuals promptly** where there is a high risk to their rights and freedoms.
- iv. **Document all breaches** in our internal breach register, regardless of severity or outcome.

15. Cookies & Website Tracking

Our website uses cookies to improve your experience. The cookies we use fall into two categories:

Essential Cookies: Required for core website functionality. These cannot be disabled and do not collect personal information.

Analytics Cookies: Help us understand how visitors use our site (e.g. via Google Analytics). These can be controlled through your browser settings. Disabling analytics cookies has no effect on your ability to use the site.

16. Changes to This Policy

We may update this Privacy Policy periodically to reflect changes in our operations or legal obligations. All updates will be published on our website with a revised effective date. Where changes are significant, we will communicate them directly to registered donors and partners.

17. Contact Us

For any privacy-related queries, data access requests, or safeguarding concerns, please reach out to us through the following:

Privacy / Data Requests	privacy@lightlovefoundation.org
General Enquiries	info@lightlovefoundation.org
Location	Baringo, Kenya