

FITC ENERGY GROUP

Est. 2024

Data Protection & Privacy Policy

Safeguarding Personal Data with Accountability and Care

Version: 1.0

Effective Date: 1 January 2025

Approved by: Board of Directors

Classification: Confidential — Internal Use Only

1. Policy Statement

FITC Energy Group is committed to protecting the privacy and personal data of its employees, clients, contractors, and business partners. We collect, process, and store personal data only when necessary, and we do so in accordance with applicable data protection laws.

This Policy establishes the framework for how FITC Energy Group handles personal data across all its operations. It applies to all processing activities carried out by FITC Energy Group, whether in electronic or physical form.

2. Legal Basis

FITC Energy Group's data protection practices are governed by the following legal frameworks:

Field	Details
Kenya	Data Protection Act, 2019 (DPA 2019); Office of the Data Protection Commissioner (ODPC) regulations.
European Union	General Data Protection Regulation (GDPR) — applicable where EU residents' data is processed.
United Kingdom	UK GDPR and Data Protection Act 2018 — applicable to UK operations and data subjects.
Other Jurisdictions	Applicable national data protection laws in all countries of operation.

3. Data Protection Principles

All personal data processed by FITC Energy Group must comply with the following principles:

- **Lawfulness, Fairness & Transparency** — Data is processed on a valid legal basis and individuals are informed of how their data is used.
- **Purpose Limitation** — Data is collected for specified, explicit, and legitimate purposes and not processed in incompatible ways.
- **Data Minimisation** — Only data that is necessary for the stated purpose is collected.
- **Accuracy** — Personal data is kept accurate and up to date; inaccurate data is corrected or deleted.
- **Storage Limitation** — Data is retained only as long as necessary and in accordance with the company's Retention Schedule.
- **Integrity & Confidentiality** — Data is protected against unauthorised access, accidental loss, and destruction using appropriate technical and organisational measures.
- **Accountability** — FITC Energy Group takes responsibility for demonstrating compliance with these principles.

4. Categories of Personal Data Processed

FITC Energy Group may process the following categories of personal data:

- Employee data: name, contact details, national ID, payroll information, employment records, disciplinary records
- Client and business partner data: company representatives' contact details, KYC documentation, transaction records
- Candidate data: CVs, interview notes, background check results
- Visitor and site access data: sign-in records, CCTV footage, access logs

FITC Energy Group processes special category data (including health data for HSE purposes) only where there is an explicit lawful basis and appropriate safeguards are in place.

5. Legal Bases for Processing

Personal data is processed on one or more of the following legal bases:

- Performance of a contract — processing is necessary to fulfil an employment contract or client agreement
- Legal obligation — processing is required to comply with applicable law
- Legitimate interests — processing is necessary for FITC Energy Group's legitimate business interests, where not overridden by individuals' rights
- Consent — where required by law; consent must be freely given, specific, and withdrawable

6. Data Subject Rights

Individuals whose personal data FITC Energy Group processes have the following rights (subject to applicable exceptions):

- Right of access — to receive a copy of personal data held about them
- Right to rectification — to correct inaccurate or incomplete data
- Right to erasure — to request deletion of data no longer necessary for the original purpose
- Right to restriction — to limit processing in certain circumstances
- Right to data portability — to receive data in a machine-readable format (where applicable)
- Right to object — to object to processing based on legitimate interests or for direct marketing

Data subject requests should be directed to:

FITC Energy Group will

respond within 30 calendar days.

7. Data Security

FITC Energy Group implements technical and organisational measures to protect personal data, including:

- Encryption of personal data in transit and at rest
- Role-based access controls and the principle of least privilege
- Regular security assessments and penetration testing
- Employee training on data security and phishing awareness
- Secure disposal of physical records and electronic devices

In the event of a personal data breach, FITC Energy Group will notify the relevant data protection authority within 72 hours where required, and affected individuals without undue delay where there is a high risk to their rights and freedoms.

8. International Data Transfers

Where personal data is transferred outside the country of collection, FITC Energy Group will ensure that appropriate transfer mechanisms are in place, including:

- Adequacy decisions by relevant data protection authorities
- Standard Contractual Clauses (SCCs) or Binding Corporate Rules (BCRs)
- Other approved transfer mechanisms under applicable law

9. Third-Party Processors

Where FITC Energy Group engages third parties to process personal data on its behalf, a Data Processing Agreement (DPA) compliant with applicable law must be in place. Third-party processors must provide sufficient guarantees regarding their data protection measures.

10. Retention & Disposal

Personal data is retained in accordance with FITC Energy Group's Data Retention Schedule, which specifies retention periods for each category of data based on legal, regulatory, and business requirements. Upon expiry of the retention period, data is securely deleted or anonymised.

Policy Owner, Contact & Review

Field	Details
Policy Owner	Data Protection Officer (DPO)
DPO Contact	privacy@fitc-energy.com
Review Frequency	Annual, or upon significant regulatory change
Next Review Date	1 January 2026
Applicable Legislation	Kenya DPA 2019; EU GDPR; UK GDPR & DPA 2018
Governing Body	FITC Energy Group Board of Directors