

PRIVACY POLICY

Suburban Cart Limited

Effective Date: 01.03.2025

Version: 1.0

1. Introduction

Suburban Cart Limited ("Suburban", "we", "our", or "us") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you visit or use our e-commerce platform (www.suburbancart.co.ke), our mobile applications, and any related services (collectively, the "Platform").

By accessing or using the Platform, you agree to the terms of this Privacy Policy. If you do not agree, please refrain from using our services.

2. Legal Compliance

This Policy is issued in compliance with the Data Protection Act, 2019 (Kenya) and any applicable subsidiary regulations. We also consider global best practices in digital privacy and data protection.

3. What Personal Data We Collect

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

- i. Identity Information: Full name, gender, date of birth, national ID/passport number (where applicable);
- ii. Contact Information: Email address, phone number, billing and shipping addresses;
- iii. Account Credentials: Login credentials, user profile information, and preferences;
- iv. Transactional Data: Order history, payment method details (collected through secure third-party processors);
- v. Device and Technical Data: IP address, browser type, device identifiers, cookies, location data, log files;
- vi. Marketing and Communication Preferences: Records of communications and opt-ins/opt-outs;
- vii. User-Generated Content: Reviews, comments, complaints, and support requests.

4. How We Collect Personal Data

We collect personal data from:

- i. You directly, when you register, place an order, contact support, or engage with features;
- ii. Cookies and tracking technologies when you use the Platform;
- iii. Third parties such as payment processors, delivery partners, or analytics services.

5. How We Use Your Personal Data

Your data is used lawfully and for the following purposes:

- i. To register and manage your user account;
- ii. To process orders, payments, and deliveries;
- iii. To communicate order confirmations, updates, and customer support;
- iv. To improve the functionality, security, and performance of our Platform;
- v. To personalise your shopping experience;
- vi. To detect, prevent, and address technical issues, fraud, or abuse;
- vii. To comply with legal obligations (e.g., tax, regulatory reporting);
- viii. To send you marketing messages (with your consent).

6. Lawful Basis for Processing

We rely on the following legal bases under the Data Protection Act:

- i. Consent: For direct marketing and optional features;
- ii. Contractual Necessity: To fulfil orders and manage your account;
- iii. Legal Obligation: For compliance with statutory requirements;
- iv. Legitimate Interests: To improve services, conduct analytics, prevent fraud.

7. Sharing of Personal Data

- i. We may share your personal data with:
- ii. Vendors and third-party sellers on the Platform for order fulfilment;
- iii. Service providers, including payment gateways (e.g., M-PESA, Paystack), delivery companies, IT support, and email marketing platforms;
- iv. Regulatory authorities, courts, or law enforcement where legally required;
- v. Affiliates or acquirers, in the event of a merger, acquisition, or restructuring.
- vi. We ensure that all third-party processors uphold adequate data protection standards.

8. International Transfers

Where your data is transferred outside Kenya (e.g., cloud storage or service providers), we ensure appropriate safeguards are in place, such as contractual clauses or adequacy assessments.

9. Data Retention

We retain your personal data only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. For example:

Order and transaction records – retained for at least 7 years;

Marketing preferences – until you opt out;

Account data – until your account is deactivated or deleted.

After the retention period, data is securely deleted or anonymised.

10. Your Rights

As a data subject under Kenyan law, you have the following rights:

Right to access your personal data;

Right to correct inaccurate or incomplete data;

Right to withdraw consent (where processing is based on consent);

Right to object to processing for marketing;

Right to erasure (“right to be forgotten”) in applicable circumstances;

Right to data portability, where applicable;

Right to lodge a complaint with the Office of the Data Protection Commissioner.

Requests may be made by emailing us at admin@suburban.ke. We may require verification before acting on your request.

11. Cookies and Tracking Technologies

We use cookies and similar technologies to:

Enable Platform functionality and session management;

Remember your preferences and shopping cart;

Analyse site performance and user engagement;

Deliver personalised advertisements (with your consent).

You may manage cookie preferences via your browser settings. For more information, refer to our Cookies Policy.

12. Data Security

We implement appropriate technical and organisational measures to protect your personal data, including:

Secure Socket Layer (SSL) encryption;

Access controls and user authentication;

Firewall and malware protection;

Regular security audits.

Despite our efforts, no online system is completely secure. You are advised to maintain the confidentiality of your credentials and report suspicious activity.

13. Children's Privacy

Our Platform is not intended for children under the age of 18. We do not knowingly collect personal data from minors. If we become aware that data has been collected from a child, it will be promptly deleted unless retained for legal purposes.

14. Changes to this Policy

We may update this Privacy Policy from time to time. Material changes will be communicated via email or Platform notification. The latest version will always be accessible at [Privacy Policy Page](#).

Your continued use of the Platform after such changes constitutes your acceptance of the revised terms.

15. Contact Us

If you have questions or concerns about this Privacy Policy or how we handle your personal data, contact:

Data Protection Officer

Suburban Cart Limited

 Email: admin@suburban.ke

 Phone: [+254793999433](tel:+254793999433)

 Address: Karen Professional Centre, Karen, Nairobi, Kenya