

Document 4 — Privacy Policy

Last updated: 12/04/2026

1. Who we are

Lazare French Academy, operated by Lazare French Academy ("Lazare", "we", "us", "our"), is the data controller of personal data processed through the Platform for the purposes described in this Policy.

Our contact for privacy matters: contact@lazarefrenchacademy.com. Postal address: P.O Box 1 00614, Wangige, Kiambu County, Kenya

2. Scope

This Policy explains how we collect, use, share, and protect personal data when:

- You visit our website or use the Platform;
- You register as a Teacher or represent a School on the Platform;
- We conduct KYC/KYB verification;
- We administer placements, payments, and payouts;
- You contact us by email, phone, or other means.

3. Legal basis

We process personal data under the Data Protection Act, 2019 on the following bases:

- Consent, for marketing communications and optional profile information;
- Performance of a contract, for account creation, placement administration, and payment;
- Compliance with a legal obligation, including tax, anti-money-laundering, and safeguarding obligations;
- Legitimate interests, including platform security, fraud prevention, dispute resolution, and improving our services, balanced against your rights and freedoms;
- Protection of vital interests, in rare cases of urgent safeguarding.

4. Personal data we collect

From Teachers:

- Identification data: full name, date of birth, national ID or passport number, photograph;
- Contact data: email address, phone number, postal address;
- Professional data: academic certificates, teaching qualifications, CV, work history, references;
- Background check data: Certificate of Good Conduct, declarations regarding criminal record;
- Financial data: M-Pesa or bank account details for payout, KRA PIN;
- Platform activity: logins, messages with Schools, placements accepted, ratings.

From Schools:

- Institution data: legal name, registration number, KRA PIN, Ministry of Education registration, physical address;
- Representative data: name, role, contact details, and identification of the authorised signatory;

- Financial data: billing details, payment records;
- Platform activity: requests, selections, feedback, ratings.

Automatically:

- Device and log data: IP address, browser type, operating system, referring URLs, pages visited;
- Cookies and similar technologies (see section 10).

5. Sensitive personal data

Some of the information we process is classed as sensitive personal data under the Data Protection Act, 2019 — in particular, data revealing criminal record status (Certificate of Good Conduct). We process this only where strictly necessary for safeguarding learners and with appropriate safeguards, including restricted access, encryption at rest, and limited retention.

6. How we use personal data

- To verify identities and qualifications during KYC/KYB;
- To create, maintain, and secure user accounts;
- To match Teachers to Schools and administer placements;
- To process payments and payouts and to comply with tax obligations;
- To communicate with users about their account, bookings, and service updates;
- To investigate and resolve complaints, disputes, and safeguarding concerns;
- To prevent fraud, misuse, and unauthorised access;
- To comply with legal and regulatory obligations;
- With consent, to send marketing about new courses, placements, or Platform features.

7. Who we share personal data with

- Schools receive relevant Teacher profile data necessary to make a placement decision;
- Teachers receive relevant School information necessary to evaluate a placement;
- Payment processors (e.g., M-Pesa / [BANK / OTHER PROCESSORS]) for the purpose of collecting and disbursing funds;
- Hosting and cloud infrastructure providers that store data on our behalf, including, AWS, Oracle and Google Cloud;
- Professional advisers (lawyers, accountants, auditors) under duties of confidentiality;
- Regulators, courts, and law enforcement where legally required;
- Successors in the event of a merger, acquisition, or sale of assets, under equivalent protections.

We do not sell personal data.

8. International transfers

Some of our service providers are located outside Kenya. Where personal data is transferred outside Kenya, we do so in compliance with section 48 and 49 of the Data Protection Act, 2019, including by relying on adequacy, appropriate safeguards, or the data subject's explicit consent.

9. Retention

We retain personal data for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements. Indicative retention periods:

- Active account data: for the duration of the account;
- KYC/KYB records: 5 years after account closure, in line with anti-money-laundering and tax law requirements;
- Payment and transaction records: 5 years in line with Kenyan tax law;
- Marketing data: until consent is withdrawn;
- Safeguarding records: 5 years, given the seriousness of the subject.

10. Cookies

We use cookies and similar technologies for authentication, security, preferences, and analytics. You can control cookies through your browser settings. Where required, we request your consent before setting non-essential cookies.

11. Your rights

Under the Data Protection Act, 2019, you have the right to:

- Be informed of the use to which your data is put;
- Access the data we hold about you;
- Request correction of inaccurate or incomplete data;
- Request deletion where the data is no longer necessary, subject to legal retention obligations;
- Object to processing based on legitimate interests or direct marketing;
- Withdraw consent where processing is based on consent;
- Lodge a complaint with the Office of the Data Protection Commissioner (www.odpc.go.ke).

To exercise any of these rights, contact us at contact@lazarefrenchacademy.com. We will respond within 30 days.

12. Security

We implement technical and organisational measures appropriate to the risk, including encryption in transit and at rest, access controls, logging, and regular reviews. No system is perfectly secure; users should protect their own account credentials and notify us immediately of any suspected compromise.

13. Children

The Platform is not intended for use by children under 18. We do not knowingly collect personal data directly from children. Where placements involve learners in Schools, the Schools act as data controllers for learner data under their own policies.

14. Changes to this Policy

We may update this Policy from time to time. Material changes will be notified to registered users. The "Last updated" date at the top of this Policy reflects the most recent revision.

15. Contact

Questions, requests, or complaints about privacy: contact@lazarefrenchacademy.com. Office of the Data Protection Commissioner: www.odpc.go.ke.