



*Driven by Trust. Designed for Impact.*

## Privacy Statement

**Last Updated: 2025/10/07**

**Effective Date: 2025/10/07**

**Registered in: Republic of Kenya**

### 1. Introduction

This Privacy Statement explains how Swanstone Realty Limited (“Swanstone”, “we”, “our”, or “us”) collects, uses, shares, and protects your personal data when you interact with our website, mobile applications, or related digital platforms, or when you otherwise engage with us — for example, when buying, selling, renting, managing, or listing property through us.

It also sets out your rights under applicable privacy laws, including the Data Protection Act, 2019 (Kenya), and where applicable, international frameworks such as the General Data Protection Regulation (GDPR).

By using our services, you agree to the terms of this Privacy Statement.

### 2. Scope of This Privacy Statement

This Privacy Statement applies to:

- All Swanstone Realty Limited websites and mobile applications;
- All AI-integrated property aggregation, search, and valuation tools;
- Any interaction (online or offline) through which you provide personal data to us; and
- Communications or business relationships with Swanstone staff, contractors, or affiliates.

Where local laws or data protection requirements differ, local Privacy Notices (for instance, for users outside Kenya) may supplement or override this statement.

### 3. What is Personal Data?

“Personal Data” refers to any information that identifies or can reasonably identify an individual.

This may include:

- Name, contact details, address;
- Identification numbers (e.g., ID/passport);
- Property ownership or transaction history;
- Banking or financial details;



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- **Employment and income data; and**
- **Device identifiers, IP address, and online behavior data.**

**We may collect personal data from you directly, through our AI-driven platform interactions, or from third-party data sources such as property portals, public registries, or partner agencies.**

#### **4. Swanstone as Data Controller**

**Swanstone determines the purposes and means of processing your personal data and therefore acts as a Data Controller.**

**We have appointed a Data Protection Officer (DPO) to oversee compliance with this Statement and relevant data laws.**

**Contact:**

**Email: [compliance@swanstonerealty.co.ke](mailto:compliance@swanstonerealty.co.ke)**

**Address: Krishna Center Westlands Woodvale Grove Nairobi, Kenya**

#### **5. How We Collect Personal Data**

**We collect information in several ways:**

##### **5.1 Directly from You**

**When you:**

- **Register an account or listing on our platform;**
- **Inquire about properties, valuations, or investments;**
- **Submit property ownership or tenancy information;**
- **Attend our events or meetings;**
- **Apply for employment or partnerships;**
- **Communicate with our staff by email, phone, or WhatsApp.**

##### **5.2 Automatically via Technology**

**When you use our digital services, our systems may collect:**

- **Device information, IP address, browser type, and operating system;**
- **Usage analytics (pages visited, search terms, interaction time);**
- **Geolocation data (to show nearby properties);**



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- **AI-interpreted insights from your search patterns to improve personalization.**

### 5.3 From Third Parties

We may obtain data from:

- **Public property registries and land records;**
- **Partner agents, developers, or listing aggregators;**
- **Payment processors and banking intermediaries;**
- **Identity verification and credit reference bureaus;**
- **Social media and advertising networks.**

### 6. Use of AI and Automated Data Processing

Swanstone Realty employs Artificial Intelligence (AI) and machine learning systems to analyze, aggregate, and predict property-related insights.

These technologies may process your data to:

- **Suggest property listings based on location, budget, or preferences;**
- **Generate automated property valuations;**
- **Detect fraudulent or duplicate listings;**
- **Tailor marketing messages and advertisements;**
- **Improve accuracy in search results and recommendations.**

All automated profiling is subject to human oversight.

We do not make decisions with legal or significant effects on you solely based on automated processing.

### 7. Purpose and Legal Basis for Processing

We process your personal data for the following purposes:

Purpose	Examples of Data Used	Lawful Basis
To provide property listing, search, management, and valuation services	Name, contact, location, property details	Contractual necessity
To conduct Know-Your-Customer (KYC), Anti-Money Laundering (AML), and due diligence checks	ID, passport, proof of address, bank details	Legal obligation
To improve and personalize your platform experience	Browsing and behavioral data	Legitimate interest



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To process payments or commissions	Banking and transaction details	Contractual necessity
To communicate offers, newsletters, or property alerts	Name, email, preferences	Consent
To protect our systems and detect fraud	IP address, device information, account activity	Legitimate interest
To comply with Kenyan and international legal requirements	All relevant data	Legal obligation

## 8. Who We Share Your Data With

We may share your personal data only when lawful and necessary, including with:

- Service providers (CRM systems, payment gateways, IT and hosting companies);
- Property developers, landlords, or agents for legitimate transactions;
- Regulators and government agencies (e.g., KRA, DCI, or data protection authority) where legally required;
- Professional advisers (lawyers, auditors, valuers);
- Third-party verification and analytics providers supporting our AI systems.

We require all partners to implement strict confidentiality and data protection safeguards.

## 9. International Data Transfers

Where your personal data is transferred outside Kenya — for example, to cloud servers or data processors — Swanstone ensures that:

- Transfers comply with the Kenya Data Protection (General) Regulations, 2021;
- Equivalent data protection safeguards (e.g., Standard Contractual Clauses) are in place.

## 10. Data Security

We apply robust technical and organizational measures to protect your personal data, including:

- End-to-end encryption;
- Firewalls and intrusion detection;
- Access control and staff training;
- AI-assisted anomaly and threat detection.

However, no system is completely secure. You acknowledge that transmission of data online carries inherent risk.



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## 11. Retention of Personal Data

We retain your data only as long as necessary for the purpose collected, unless a longer period is required by law.

Retention typically applies while:

- You maintain an account or active transaction;
- We have an ongoing legal or regulatory obligation; or
- We need to preserve records for audit or tax purposes.

When data is no longer needed, it is securely deleted or anonymized.

## 12. Your Data Rights

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

- Access your personal data;
- Request correction or deletion;
- Object to processing or marketing;
- Withdraw consent at any time;
- Request data portability;
- File a complaint with the Office of the Data Protection Commissioner (ODPC).

To exercise your rights:

Email: [compliance@swanstonerealty.co.ke](mailto:compliance@swanstonerealty.co.ke)

## 13. Marketing Communications

We may send you marketing communications about properties, investment opportunities, or real estate insights that match your interests.

You may opt out at any time by:

- Clicking “Unsubscribe” in our emails; or
- Emailing [compliance@swanstonerealty.co.ke](mailto:compliance@swanstonerealty.co.ke).

Even after opting out, you may still receive transactional or legally required notifications.

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#### 14. Cookies and Analytics

Our website uses cookies and similar technologies to improve user experience and measure site performance.

You may control cookie settings through your browser.

For more information, refer to our Cookie Notice.

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#### 15. Children's Data

Swanstone's services are not directed to persons under 18 years of age.

We do not knowingly collect data from minors.

If we become aware that we have collected such data, we will delete it immediately.

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#### 16. Changes to This Privacy Statement

We may update this Privacy Statement periodically to reflect changes in law, technology, or company operations.

The most recent version will always be available on our website.

Significant changes will be communicated directly via email or notice on our platform.

#### 17. How to Contact Us

Swanstone Realty Limited

Krishna Center Woodvale Grove

Nairobi, Kenya

Email: [compliance@swanstonerealty.co.ke](mailto:compliance@swanstonerealty.co.ke)

Phone: 0745 111 115

You may also raise complaints to the Office of the Data Protection Commissioner (ODPC) via:

 [communications@odpc.go.ke](mailto:communications@odpc.go.ke)

 <https://www.odpc.go.ke>

#### 18. AI and Data Ethics Policy (Annex)



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Swanstone's AI models comply with principles of transparency, fairness, non-discrimination, and accountability.

We ensure that:

- **No automated valuation or recommendation constitutes financial or legal advice;**
- **All AI-generated insights are subject to human review;**
- **User data is never sold, monetized, or used for unrelated profiling;**
- **Users retain the right to opt out of AI-based personalization.**

This Privacy Statement aligns with:

- **Kenya's Data Protection Act, 2019**
- **EU GDPR (2018) for international users**
- **ISO/IEC 27701 standards for data privacy management**