PRIVACY SUPPLEMENT

Kenya Privacy Supplement

Additional information for data subjects in Kenya, under the Data Protection Act 2019.

BS-PRI-004 · Version 1.0 · Effective 15 October 2026 · Live
Applies to: Members and visitors in Kenya · Governing law: Data Protection Act 2019 (Kenya) · Owner: Data Protection Lead, BabuSpace Ltd

Nairobi is one of the cities BabuSpace serves, and mobile money is central to how people pay there. This supplement sets out how Kenya's Data Protection Act 2019 applies, and adds to the Privacy Policy (BS-POL-003).

1. Who is responsible

1.1 **Data controller:** BabuSpace Ltd, registered in England and Wales (No. 17291878), Holborn, London, United Kingdom.

1.2 The Act applies to us because we process the personal data of data subjects in Kenya.

1.3 Contact: info@babuspace.uk, subject line "DPA Request".

1.4 Where registration with the Office of the Data Protection Commissioner is required for our processing, we will register and publish the details at babuspace.uk/legal.

2. Your rights

You have the right to:

- **be informed** of the use to which your personal data is put;
- **access** your personal data held by us;
- **object** to the processing of all or part of your personal data;
- **correction** of false or misleading data;
- **deletion** of false or misleading data about you;
- **data portability**, where technically feasible;
- **not be subject to a decision based solely on automated processing**, including profiling, which produces legal effects or significantly affects you. See BS-PRI-007;
- **complain to the Data Protection Commissioner**.

2.1 We respond within **one month**, free of charge.

2.2 We may ask you to verify your identity first.

3. How we use your data

3.1 The full list of purposes and lawful bases is in BS-POL-003 §3. In Kenya, the ones most likely to matter to you are:

What	Why	Basis
Your name, phone number and ID	Verifying who you are before a stay	Contract and legal obligation
Mobile money identifiers	Taking payment and issuing refunds to the originating wallet	Contract
Booking and message history	Running the stay and resolving disputes	Contract and legitimate interests
Fraud and sanctions screening signals	Keeping the platform safe	Legal obligation and legitimate interests

3.2 **Refunds to mobile money return to the originating wallet.** That means we hold the wallet identifier for as long as a refund could still arise under the Cancellation Policy (BS-POL-010), including for the rebooking rebate, which can run until your original dates have passed.

4. Consent

4.1 Where we rely on consent - marketing and non-essential cookies - it is freely given, specific, informed and unambiguous, and you can withdraw it at any time without penalty.

4.2 We do not make a booking conditional on consenting to marketing.

5. Transfers out of Kenya

5.1 Your data is transferred to the United Kingdom and to other countries where our providers operate.

5.2 We transfer only where we have given proof to the Data Protection Commissioner, on request, of appropriate safeguards in the destination country, or where the transfer is necessary for the performance of our contract with you, or where you have given consent after being informed of the possible risks.

5.3 Where the law requires particular categories of data to be processed through a server or data centre located in Kenya, we will comply with that requirement before processing data in that category.

6. Breach notification

6.1 Where a breach creates a real risk of harm to you, we notify the **Data Protection Commissioner within 72 hours** of becoming aware of it, and we notify you in writing within a reasonable period.

7. The regulator

Office of the Data Protection Commissioner (ODPC)

- odpc.go.ke
- info@odpc.go.ke

7.1 You may complain to the ODPC directly.

8. Hosts in Kenya

8.1 A Host is a data controller in their own right for Guest information, with their own obligations under the Act. See BS-POL-008.

8.2 **Tax.** Our Taxes Policy (BS-POL-007) covers the United Kingdom and South Africa only at this version. Kenyan hosts should take local advice on income tax, VAT and any digital service or significant economic presence rules that may apply. We will publish a Kenyan section when we can do so accurately.

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BabuSpace Ltd · Registered in England and Wales, Company No. 17291878 · Holborn, London, United Kingdom Sits beneath the BabuSpace Privacy Policy (BS-POL-003); it adds to that Policy and does not replace it. Questions:
info@babuspace.uk