

PRIVACY POLICY

Superior Homes Kenya | www.superiorhomes.co.ke
Effective date: 12 October 2026

1. Introduction

Superior Homes Kenya ("**Superior Homes**", "**we**", "**us**" or "**our**") develops residential and hospitality master-planned communities and offers homes, plots and related real estate services in Kenya. We respect your privacy and are committed to protecting your personal data.

This Privacy Policy explains how we collect, use, share and protect personal data when you visit www.superiorhomes.co.ke (the "**Website**"), contact us, enquire about a property, book a site visit, or otherwise deal with us. We process personal data in accordance with the Data Protection Act, 2019 of Kenya, the Data Protection (General) Regulations, 2021, and other applicable laws.

Please read this Privacy Policy carefully. Using the Website does not mean that you have consented to the processing of your personal data. Where we rely on your consent, we will ask for it separately and clearly (see Section 6).

2. Who We Are

Superior Homes Kenya is the data controller responsible for your personal data collected through the Website. Our contact details are:

- **Address:** Greenpark Estate, Mombasa Road, Athi River. P.O. Box 15992 - 00100, Nairobi, Kenya
- **Email:** info@superiorhomes.co.ke
- **Telephone:** +254 713 888 333

For any data protection question or request, write to us at info@superiorhomes.co.ke marked "Attention: Data Protection".

3. Personal Data We Collect

"Personal data" means any information that identifies you or can be used to identify you. Depending on how you interact with us, we may collect the following:

Information you give us

- **Identity and contact details:** your name, email address, telephone number, postal address and preferred method of contact.
- **Enquiry and property details:** the properties or developments you are interested in, your budget, preferred payment plan, viewing preferences and any messages you send us through forms, email, phone or WhatsApp.
- **Purchase and transaction information:** where you proceed to reserve or buy a property, we may collect your national ID or passport number, KRA PIN, date of birth, occupation, details of your next of kin, your marital status and family details where relevant to the transaction, and payment and financing information. This is collected

through our sales process and agreements, not through casual browsing of the Website.

- **Recruitment information:** if you apply for a job or partnership opportunity, your CV, work history and references.
- **Marketing preferences:** your subscription choices and communication preferences.

Information we collect automatically

- **Technical data:** IP address, browser type and version, device type, operating system, time zone, and language settings.
- **Usage data:** pages viewed, links clicked, time spent on pages, referring website and general location (such as city or county) derived from your IP address.
- **Cookie data:** information collected through cookies and similar technologies, as described in Section 7.

Information from other sources

We may receive your details from authorised sales agents and referral partners, property listing platforms, advertising and social media platforms (for example, when you submit a lead form), and publicly available sources. Where we collect your personal data from someone other than you, we will tell you what we hold and why within 14 days of collecting it.

Sensitive personal data

Under the Data Protection Act, 2019, "sensitive personal data" includes property details, marital status and family details (such as the names of your spouse, children or parents), as well as health, biometric, genetic, race, ethnic and religious or belief data. Because we deal in property, we may need some of this information, for example the property you are buying, your marital status and your next of kin, to carry out your purchase and register your title or lease. We process sensitive personal data only where it is necessary for those purposes and permitted by law, with additional safeguards, and with your consent where the law requires it. We do not ask for health, religious, biometric or similar data through the Website, so please do not send it to us unless we specifically ask for it.

4. Mandatory and Voluntary Data

The Data Protection Act, 2019 requires us to tell you whether the personal data we ask for is mandatory or voluntary, and what happens if you do not provide it. In simple terms: **some of the data we collect is mandatory to enable us to meet obligations under the law or our contracts with you. Data collected for marketing and promotional materials is voluntary and will only be used with your consent.**

Mandatory data

We are required by law, or need in order to perform our contract with you, to collect certain data when you reserve or buy a property. For example, documents such as your National ID or passport and KRA PIN are required for conveyancing and, under the Land Registration Act, to register a lease. Payment, financing and next-of-kin details may also be required to carry out your purchase.

Consequence of not providing it: if you do not provide all or part of the mandatory data requested, we may be unable to enter into or perform the contract with you, complete the conveyance or register your lease, and the transaction may not proceed.

Voluntary data

Data we collect so that we can send you newsletters, brochures, offers and other marketing or promotional materials is voluntary. We will only use it for those purposes with your consent, and you may withdraw that consent at any time.

Consequence of not providing it: none, other than that we will not be able to send you marketing or promotional materials. You can still browse the Website and make general enquiries.

5. How We Use Your Personal Data

We use your personal data only for specified, lawful purposes, including to:

- respond to your enquiries and provide information about our properties, developments and prices;
- arrange site visits, viewings, meetings and show-house appointments;
- prepare offers, reservations, sale agreements and payment plans, and carry out the sale and handover of a property;
- verify your identity and carry out checks required by law, including anti-money laundering and fraud prevention checks;
- process payments and manage our customer accounts and after-sales support;
- send you updates, brochures, offers and news about our developments, where you have agreed to receive them or where the law allows;
- operate, secure, maintain and improve the Website and understand how visitors use it;
- assess job and partnership applications;
- comply with our legal, regulatory and tax obligations; and
- establish, exercise or defend legal claims.

We will not use your personal data for a purpose that is incompatible with the purpose for which it was collected without informing you and, where required, obtaining your consent.

6. Lawful Basis for Processing

We process your personal data only where we have a lawful basis to do so under the Data Protection Act, 2019, namely:

- **Consent:** for example, when you agree to subscribe to our newsletter or to receive marketing messages. You may withdraw your consent at any time.
- **Performance of a contract:** where processing is necessary to take steps at your request before entering into a contract, or to perform a contract with you.
- **Legal obligation:** where we must process data to comply with the law, such as tax, land and anti-money laundering requirements.
- **Legitimate interests:** where processing is necessary for our legitimate business interests, such as securing the Website, preventing fraud and improving our services, and these interests are not overridden by your rights and freedoms.

Where we rely on consent, we will ask for it clearly and for each specific purpose, and we will keep a record of it. We do not treat silence, pre-ticked boxes or your use of the Website as consent, and we will not make your consent to unnecessary processing a condition of

providing you with our services. Withdrawing your consent does not affect processing carried out before you withdrew it.

7. Cookies and Similar Technologies

The Website uses cookies, which are small text files stored on your device, to make the Website work properly, remember your preferences, and understand how visitors use our pages. The types of cookies we may use are:

- **Essential cookies**, which are necessary for the Website to function and cannot be switched off.
- **Analytics cookies**, which help us understand how visitors use the Website so that we can improve it.
- **Marketing cookies**, which may be used to show you relevant advertisements and measure the effectiveness of our campaigns.

You can control or delete cookies through your browser settings. Blocking some cookies may affect how the Website works. We will ask for your consent before placing analytics or marketing cookies, and you can change your choice at any time.

8. Who We Share Your Data With

We do **not** sell your personal data, and we do not give it to third parties for their own direct marketing. We may share it only where necessary and with appropriate safeguards, with:

- **Service providers** who support our operations, such as website hosting, IT and security providers, email and SMS platforms, customer relationship management (CRM) systems, analytics and advertising providers.
- **Professional advisers**, including lawyers, conveyancers, surveyors, auditors and insurers.
- **Financial institutions and financing partners**, such as banks, SACCOs and mortgage providers, where you apply for financing or make payments.
- **Authorised sales agents, contractors and property managers** who assist us in serving you.
- **Government and regulatory authorities**, including the Kenya Revenue Authority, land registries, law enforcement and courts, where required by law.
- **Business successors**, in the event of a merger, acquisition, restructuring or sale of assets, subject to the protection of your data.

Where we use third-party processors, we require them, under written contracts, to handle your data only on our instructions, to keep it confidential and secure, and to comply with applicable data protection laws.

9. Transfers of Data Outside Kenya

Some of our service providers (for example, cloud hosting, email or analytics platforms) may store or process data outside Kenya. Where we transfer personal data out of the country, we do so in line with the Data Protection Act, 2019, and only where appropriate safeguards are in place (for example, a country with adequate data protection laws or a contract containing data protection terms), where the transfer is necessary to perform a contract with you, or

where you have given your informed consent after being told of the risks. Sensitive personal data is transferred outside Kenya only with your consent and confirmed safeguards.

10. How Long We Keep Your Data

We keep personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting and reporting requirements. As a general guide:

- **General enquiries and marketing contacts:** until you opt out or for a reasonable period after our last interaction.
- **Customer and transaction records:** for the duration of our relationship and afterwards for the periods required by law. For example, tax records must generally be kept for at least five years under the Tax Procedures Act, 2015, and we may keep records for longer where other laws apply or where legal claims could still be brought.
- **Job applications:** for a limited period after the recruitment process ends, unless you ask us to keep your details for future opportunities.

When data is no longer required, we will securely delete, erase, anonymise or pseudonymise it.

11. How We Protect Your Data

We apply appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, misuse, alteration or disclosure. These include access controls, secure storage, encryption where appropriate, and confidentiality obligations for staff and service providers. No method of transmission over the internet is completely secure, so we cannot guarantee absolute security. If a breach occurs that is likely to result in a real risk of harm to you, we will notify the Office of the Data Protection Commissioner within 72 hours of becoming aware of it, and will notify you in writing within a reasonably practicable period, explaining what happened and the steps you can take to protect yourself.

12. Your Rights

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

- **be informed** of how your personal data is being used;
- **access** the personal data we hold about you;
- **object** to the processing of all or part of your personal data. Your right to object to direct marketing is absolute;
- **request correction** of false or misleading data;
- **request deletion** of false or misleading data about you, or data we are no longer entitled to keep;
- **request restriction** of the processing of your personal data in the circumstances allowed by law;
- **request a copy of your data in a portable format**, and ask us to transfer it to another data controller where technically possible;
- **not be subject to a decision based solely on automated processing**, including profiling, that has legal or similarly significant effects on you; and

- **withdraw your consent** at any time, without affecting the lawfulness of processing carried out before withdrawal.

We do not make decisions about you based solely on automated processing. To exercise any of these rights, please contact us using the details in Section 16. We may need to verify your identity before acting on your request. We act on requests free of charge and within the periods set by the Data Protection (General) Regulations, 2021: **7 days** for access, and **14 days** for correction, deletion, objection and restriction. Requests for data portability are handled within **30 days**, and a reasonable fee not exceeding our cost may apply. If we are unable to act on your request, for example where we have a legal obligation to keep the data, we will tell you why and how you can complain.

13. Marketing Communications

We send you information about our developments and offers by email, SMS, telephone or WhatsApp only where you have given your express consent, or where the law otherwise permits and we told you when we collected your details that marketing was one of the purposes. Every marketing message will clearly identify us and show you how to opt out free of charge, for example through an "unsubscribe" link, by replying "STOP", or by contacting us directly. You may choose to opt out of some types of marketing or of all marketing. Once you opt out or object, we will stop using your data for marketing, and if you ask us to stop sharing your data with third parties for marketing, we will do so within 7 days. We do not use automated calls to market to you without human involvement. Opting out of marketing will not affect messages we need to send you about an existing transaction.

14. Children's Privacy

The Website is intended for adults and is not directed at children under 18. We process a child's personal data only with the consent of a parent or guardian and only where this protects and advances the child's rights and best interests. We do not profile children for marketing. If you believe a child has provided us with personal data, please contact us and we will delete it.

15. Third-Party Links and Changes to This Policy

The Website may contain links to third-party websites, social media platforms and maps. We are not responsible for the privacy practices of those sites, and we encourage you to read their privacy policies.

We may update this Privacy Policy from time to time to reflect changes in our practices or the law. The latest version will always be posted on the Website with its effective date. Where changes are significant, we will take reasonable steps to notify you.

16. Contact Us and Complaints

If you have questions about this Privacy Policy, or wish to exercise your rights, please contact us:

- **Email:** info@superiorhomes.co.ke
- **Telephone:** +254 713 888 333
- **Post:** Superior Homes Kenya, Greenpark Estate, Mombasa Road, Athi River. P.O. Box 15992 - 00100, Nairobi

If you are not satisfied with how we have handled your personal data, you have the right to lodge a complaint, orally or in writing, with the Office of the Data Protection Commissioner of Kenya at www.odpc.go.ke. You may also have other remedies available under Kenyan law.