Privacy Policy

Move · Belong · Be

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> This Privacy Policy explains how **Move Belong Be Ltd** ("MBB", "we", "us") collects, uses, and protects your personal data when you join our waitlist or use the Move Belong Be nutrition and movement coaching platform. It is written to align with the Kenya Data Protection Act, 2019 and its Regulations.

1. Who we are

Move Belong Be is a nutrition and movement coaching service operated by Move Belong Be Ltd a company registered in Kenya under company number PVT-EY133W25 with its registered office at Jamii Towers, Upperhill, Nairobi, Kenya.

For the purposes of the Data Protection Act, 2019, MBB is the **data controller and processor** of your personal data. This means we decide how and why your data is processed.

> **ODPC registration.** MBB is committed to registering as a data controller and processor with the Office of the Data Protection Commissioner (ODPC) as required under the Act.

If you have any questions about this policy or your data, contact our data protection contact point at or by post at the address above.

2. What personal data we collect

The data we collect depends on how you interact with us. We have separated it into two stages so you can see exactly what applies to you.

2.1 When you join the waitlist

- **Your name** (first name, and last name if provided)
- **Your email address**
- **Your area of interest** (for example, nutrition, movement, or both)
- **Consent records** — whether you agreed to our terms and whether you opted in to marketing emails, together with the date and time
- **Technical data** collected automatically, such as your approximate location, device type, and how you found us (see Section 8 on cookies)

2.2 When you use the platform

If you go on to create an account and use the coaching platform, we additionally collect:

- **Account details** — login credentials and contact information
- **Body and health information** — such as age, sex, height, weight, activity level, and goals

- **Dietary and health information** — food preferences, allergies and intolerances, medical conditions relevant to your plan, injuries, pregnancy status, and similar information you provide in your questionnaire
- **Plan and progress data** — the meal and movement plans generated for you, meals and workouts you log, measurements, and check-in notes
- **Communications** — messages between you and your coach or our support team
- **Payment information** — processed by our payment provider; see Section 6

> **Sensitive personal data.** Some of the information above — in particular health, dietary, and medical information — is classified as **sensitive personal data** under the Data Protection Act, 2019. We only process this data with your **explicit consent**, and only to provide the coaching service you have asked for. You can withdraw this consent at any time (see Section 9).

3. How and why we use your data

We use your personal data only for the purposes set out below, and only where we have a lawful basis under the Act to do so.

3.1 Waitlist purposes

- To hold your place on the waitlist and manage early access
- To send you service updates about the launch (based on your request to join)
- To send you marketing and news, **only if** you have opted in — you can unsubscribe at any time

3.2 Platform purposes

- To create and manage your account
- To generate your personalised nutrition and movement plans
- To allow a qualified coach to review, adjust, and sign off your plans before they reach you
- To provide coaching, support, and progress tracking
- To process payments and manage your subscription
- To improve our service, food library, and matching logic — using aggregated or de-identified data wherever possible
- To meet our legal and regulatory obligations

3.3 Our lawful bases

Depending on the purpose, we rely on one or more of the following lawful bases (subject to your written consent) recognised under the Act:

- **Consent** — for marketing, and for all processing of sensitive (health/dietary) data
- **Performance of a contract** — to deliver the coaching service you sign up for
- **Legitimate interests** — to run and improve our business, where these do not override your rights
- **Legal obligation** — where the law requires us to process or retain data

4. Who has access to your data

We do **not** sell your personal data. We share it only in the limited ways described below.

- **MBB coaches and staff** — the qualified coach assigned to you, and support staff, on a need-to-know basis, to deliver your service
- **Service providers (data processors)** who act on our instructions, including:
  - our email platform, Brevo, which handles waitlist and marketing email
  - our hosting and infrastructure provider, Host Africa
  - our payment provider, Paystack which processes payments
- **Legal and regulatory authorities**, where we are required by law to disclose data

Each processor is bound by a contract requiring them to protect your data and use it only for the purposes we specify.

5. Transfers outside Kenya

Some of our service providers — for example our email and hosting providers — may store or process data on servers located outside Kenya.

The Data Protection Act, 2019 places specific conditions on transferring personal data outside the country. Where we transfer your data internationally, we take steps intended to ensure it receives an adequate level of protection, such as relying on providers with appropriate safeguards or obtaining your consent where required. Futhermore, where any data migration is necessary or required, consent and approval by ODPC which are required will be sought.

6. Payment information

When you subscribe to a paid plan, your payment is handled by our third-party payment provider,Paystack. We do not store your full card or mobile-money details on our systems. The provider processes your payment data under its own privacy terms and applicable security standards.

7. How long we keep your data

We keep your personal data only for as long as we need it for the purposes described in this policy.

- **Waitlist data** — until you ask to be removed, or until 12 months after the platform launches if you have not signed up
- **Account and health data** — for as long as your account is active, and for 12 months after closure, unless a longer period is required by law
- **Payment records** — for the period required by Kenyan tax and accounting law

When data is no longer needed, we securely delete or anonymise it.

8. Cookies and similar technologies

Our website uses cookies and similar technologies to make the site work, to understand how it is used, and — with your consent — for analytics and marketing. You can control non-essential cookies through the cookie banner and your browser settings.

9. Your rights

Under the Data Protection Act, 2019 you have the following rights over your personal data:

- **Access** — to be told what data we hold about you and to receive a copy
- **Correction** — to have inaccurate or incomplete data corrected
- **Erasure** — to ask us to delete your data in certain circumstances
- **Objection** — to object to certain processing, including direct marketing
- **Restriction** — to ask us to limit how we use your data
- **Portability** — to receive your data in a portable format where applicable
- **Withdraw consent** — where we rely on consent, you can withdraw it at any time without affecting processing already carried out

To exercise any of these rights, contact us at **dataprivacy@movebelongbe.co.ke**. We will respond within the timeframe required by law.

If you are not satisfied with how we handle your data, you have the right to lodge a complaint with the **Office of the Data Protection Commissioner (ODPC)** at **odpc.go.ke**.

10. How we protect your data

We use appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or misuse. These include access controls, encryption in transit, and limiting data access to those who need it. While no system can be guaranteed completely secure, we take our responsibility to protect your data seriously, and we will notify you and the ODPC of a data breach where the law requires.

11. Children

The MBB service is intended for adults aged 18 and over. We do not knowingly collect data from children. If you believe a child has provided us with personal data, contact us and we will delete it.

12. Changes to this policy

We may update this policy from time to time. When we make material changes, we will update the "last updated" date above and, where appropriate, notify you directly. The current version will always be available on our website.

13. How to contact us

Move Belong Be Ltd

Jamii Towers, Upperhill, Nairobi, Kenya

Data protection contact: **dataprivacy@movebelongbe.co.ke**

Website: **movebelongbe.com**