



InsightsIQ

Tumaini Haven Patient Assistance/Support Program

Privacy Notice (Kenya)

Version: v1.0 | Effective date: 14 Dec 2025 | Country: Kenya

This Privacy Notice explains how InsightsIQ Solutions (“InsightsIQ”, “we”, “us”) collects, uses, shares, and protects personal data for the Tumaini Haven Patient Assistance/Support Program supporting access to Abiraterone acetate for prostate cancer patients in Kenya.

1. Who we are (Data Controller)

InsightsIQ Solutions is the Data Controller for this program. We determine why and how personal data is processed for PSP/PAP services.

Privacy contact: support.tumaini@insightsiq.co

2. Scope of this notice

- Patients applying to or enrolled in the Tumaini Haven Patient Assistance/Support Program for Abiraterone acetate.
- Caregivers/family members completing enrolment on behalf of a patient.
- Healthcare professionals and PSP nurse/support staff who submit information for programme administration.

3. Personal data we collect

- Identity and contact information (e.g., name where provided, phone number, email, county, preferred language).
- Health information (e.g., prostate cancer diagnosis confirmation, disease state, treatment start dates, PSA where available, adherence/outcomes follow-up).
- Access and affordability information (e.g., SHA status, facility availability, employment status, income bands, affordability indicators).
- Logistics information (e.g., transport costs including caregiver where applicable).
- Documents you upload (e.g., prescription, clinic letters).
- Programme communications data (e.g., messages/calls/emails sent as part of PSP support).
- Website/technical data (only where you visit our website pages): device/browser information, IP address, and analytics data (see Cookie & Analytics Notice).

4. Why we use your data (purposes)

- To screen eligibility and enrol patients into the PSP/PAP.
- To coordinate access support and affordability support (where applicable).
- To provide counselling, adherence support, and outcomes follow-up.
- To manage and improve programme operations (quality checks, audit trails, troubleshooting).
- To generate aggregated/anonymised reports for programme performance (without directly identifying individuals, where feasible).
- To comply with legal and regulatory obligations (including safety reporting where applicable).

5. Legal basis for processing

- Consent: we rely on consent for PSP/PAP enrolment and for processing health information for programme support services.
- Legal obligation: we may process and disclose limited information where required by law or regulators (for example, safety reporting).
- Legitimate interests/operations: limited processing may be necessary to operate, secure, and prevent fraud/abuse of the programme (where permitted by law).

6. Who we share data with

- Treating facility team (HCPs, nurses, counsellors) involved in the patient's care and PSP support.
- PSP service providers (e.g., nurse counsellors/call-centre staff) acting under confidentiality and data protection obligations.
- Supply partners/distributor (only where necessary to coordinate product access and fulfilment).
- Technology service providers (hosting, storage, security, messaging gateways) who process data on our instructions.
- Professional advisors (auditors, lawyers) where necessary for compliance or legal claims.
- Public authorities/regulators where required by law (e.g., pharmacovigilance/safety obligations).

7. International transfers and hosting (Supabase)

We use cloud infrastructure to host and process program data. Our primary data hosting provider is Supabase, Inc. Project data may be hosted in a region you select at setup time, such as Europe (Central EU – Frankfurt) or the United States (East US – North Virginia).

- International transfers are protected using contractual safeguards (including a Data Processing Addendum and, where applicable, Standard Contractual Clauses) and technical safeguards.
- When data is stored outside Kenya, it may be subject to the laws of the host country, and those laws may differ from Kenya's laws.
- If you would like more information about transfer safeguards used for this programme, contact us at support.tumaini@insightsiq.co.

8. Security measures

- Access controls: role-based access, least-privilege permissions, and activity logging.
- Encryption: encryption in transit and encryption at rest for hosted storage and backups (where supported by our hosting provider).

- Operational safeguards: staff confidentiality obligations, training, and secure handling procedures for documents.
- We cannot guarantee absolute security, but we maintain appropriate technical and organisational measures to reduce risk.

9. How long we keep data (retention)

We retain personal data only for as long as necessary for the purposes described in this notice, and in line with legal/regulatory requirements. As a general rule, PSP/PAP records are retained for up to 10 years after the last programme interaction, unless a longer period is required for legal, safety, audit, or dispute-resolution purposes.

10. Your rights

- Request access to your personal data and obtain a copy.
- Request correction of inaccurate or incomplete data.
- Request deletion/erasure in lawful circumstances.
- Object to certain processing or request restriction/limitation of processing in lawful circumstances.
- Request data portability where applicable.
- Withdraw consent at any time (this does not affect processing already done before withdrawal).

To exercise rights or ask questions, contact support.tumaini@insightsiq.co. For your protection, we may need to verify identity before fulfilling a request.

11. Automated decisions and scoring

The programme may use rule-based screening and affordability indicators to prioritise follow-up (for example, transport burden and affordability factors). A human reviewer makes the final Tumaini Haven Patient Assistance/Support Program decision. You may request a review by contacting support.tumaini@insightsiq.co.

12. Children's data

This programme is intended for adult patients. If a caregiver submits information, they should only submit data they are authorised to share on the patient's behalf.

13. Updates to this notice

We may update this Privacy Notice from time to time. We will publish the updated version with a new effective date. Where changes are material, we will take reasonable steps to notify participants through available channels.

14. Complaints

If you are not satisfied with our response, you may lodge a complaint with Kenya's Office of the Data Protection Commissioner (ODPC).

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