



KINARA

PRIVACY POLICY

Introduction

Mara Eden Safari Camp Ltd, trading as Kinara ("Kinara", "we", "us" or "our") is committed to maintaining robust privacy protections for its customers. Our Privacy Policy is designed to help you understand how we collect, process, use and safeguard the information you provide to us and to assist you in making informed decisions when using our services.

This Privacy Policy explains how Kinara collects, processes, uses, shares, stores and protects the personal data of our guests, prospective guests, website visitors, travel partners, and other individuals who interact with us.

This Privacy Policy applies to personal data collected through our website, www.kinara.ke (the "Site"), as well as information collected or processed in connection with your booking, communications with us, and your stay at Kinara Safari Camp in the Maasai Mara National Reserve, Kenya.

We process personal data in accordance with the Data Protection Act, 2019, the Data Protection (General) Regulations, 2021, and other applicable data protection laws and regulations in Kenya (collectively, "Data Protection Laws"). By using our Site, submitting an enquiry or making a booking, or visiting our camp, you acknowledge that you have read and understood this Privacy Policy.

By accessing our Sites, Systems or Services, you accept Kinara's Privacy Policy and you consent to the collection, processing, storage, use and disclosure of your Personal Information as described in this Privacy Policy and other statutory provisions or laws enacted in force in Kenya.

Who We Are

Kinara is operated by Mara Eden Safari Camp Ltd, an ultra-luxury tented safari camp located in the Maasai Mara National Reserve, Kenya. For the purposes of the Data Protection Laws, Mara Eden Safari Camp Ltd is the "data controller" responsible for your personal data.

Registered office: Argwings Kodhek Road, Hurlingham, P.O. Box 1939-00606, Nairobi, Kenya

Data Protection contact: privacy@kinara.ke

Scope of This Policy

This Policy applies to personal data we collect through or in connection with:

- our website and any linked landing pages or booking platform or online tools;
- enquiries, reservations and correspondence with us by email, phone, WhatsApp or in person;
- your stay with us at camp, including guest registration and the use of CCTV in public areas;
- your interactions with our staff, travel trade partners, and our marketing activities.

This Policy does not apply to third-party websites, travel agents, or service providers that maintain their own privacy policies, even where we link to them or work with them.

Personal Data We Collect

Information you give us directly

- Identity details: Your full name, date of birth, gender, nationality, passport or national ID number and copies of supporting documents;
- Contact details: email address, phone number, postal/physical address;
- Booking and travel details: reservation dates, itinerary, travel preferences, flight and transfer details, travel agent or tour operator details;
- Health and safety information: allergies, dietary requirements, medical conditions, mobility needs, and (where required by law or our flight-charter partners) vaccination status;
- Emergency contact details and, where relevant, marital status (to assist with rooming);
- Payment information, processed securely by our payment providers (Kinara does not store full card numbers);
- Any communication and correspondence that you have with Kinara;
- Any other information you choose to share with us, for example through enquiry forms, guest surveys, reviews, or correspondence.

Where you provide information about another person, such as a travelling companion or emergency contact, you should ensure that you are authorised to provide that information and, where required, that the individual has been informed about how their information will be used.

Information collected automatically

- When you use our Site, we may collect certain technical and usage information, such as your IP address, browser type, device information, operating system, pages visited, approximate location, referring website and information about how you interact with the Site.
- We may collect this information through cookies and similar technologies, as described in the Cookies section below.

Information from third parties

- We may receive personal data from third parties where it is necessary for providing our services. These parties may include travel agents, tour operators, booking platforms, corporate travel organisers, payment providers, transport providers and other service providers involved in arranging your stay.
- We will process personal data in accordance with applicable data-protection requirements and the purposes for which it was collected.

Sensitive personal data

Certain information we collect — such as health, medical and dietary information — is classified as "sensitive personal data" under the Data Protection Act. We only collect this information where necessary to provide for your safety, wellbeing and comfort during your stay, and we will seek your explicit consent before processing it, except where processing is necessary to protect your vital interests or those of another person.

How We Use Your Information

We use your personal data for the following purposes, and on the legal bases set out below:

Purpose	Examples	Legal basis (Data Protection Act, 2019)
Processing bookings and reservations	Confirming availability, preparing itineraries, arranging transfers	Performance of a contract with you
Guest safety, health and dietary needs	Allergies, medical conditions, dietary requirements	Your explicit consent / vital interests

Payment processing	Verifying and processing payments via our payment partners	Performance of a contract
Marketing communications	Newsletters, offers, travel inspiration	Your consent (you may withdraw at any time)
Legal and regulatory compliance	Immigration, tax, KWS/ Maasai Mara reserve requirements, responding to authorities	Compliance with a legal obligation
Improving our services and website	Analytics, guest feedback, service quality	Our legitimate interests, balanced against your rights
Guest and staff safety on camp	CCTV in public areas of camp for safety and wildlife-movement monitoring	Legitimate interests

Where we rely on your consent, you may withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.

We will not use your personal data for a new or incompatible purpose without a legal basis and, where required, providing you with further information or obtaining your consent.

How We Share Your Information

We do not sell your personal data. We may share your personal data with:

- Service providers who support our operations, such as reservations systems, payment processors, IT and website hosting providers, marketing platforms, flight-charter partners, and courier companies;
- Travel agents and tour operators involved in facilitating your booking;
- Government authorities and regulators, including the Kenya Wildlife Service, immigration authorities, and tax authorities, where required by law;
- Professional advisers, such as lawyers, auditors and insurers, where necessary;
- A successor entity in the event of a merger, sale, or reorganisation of our business.

Any third party we share your data with is required to protect it in a manner consistent with this Policy and the Data Protection Act.

CCTV at Camp

For the safety of our guests and staff, and to help monitor the movement of wildlife around camp, CCTV cameras operate in certain public areas and along guest walkways. Footage is retained only for as long as necessary for these purposes and is accessed only by authorised personnel.

Marketing Communications

We will only send you marketing communications (such as newsletters, offers, or travel inspiration) where you have opted in to receive them. You may withdraw your consent and unsubscribe at any time by clicking "unsubscribe" in any marketing email or by contacting us at privacy@kinara.ke.

Cookies and Website Tracking

Our Site uses cookies and similar technologies to help it function properly, remember your preferences, and understand how visitors use the Site, including through analytics and, where enabled, advertising and remarketing tools.

You can manage or disable cookies through your browser settings at any time. Please note that disabling cookies may affect the functionality of our Site.

Data Retention

We retain personal data only for as long as necessary to fulfil the purposes described in this Policy, including to satisfy any legal, accounting, or reporting requirements. When your personal data is no longer needed, we will securely delete or anonymise it.

Data Security

We implement reasonable technical and organisational measures designed to protect your personal data against unauthorised access, loss, misuse, or alteration. However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

Access to your personal data is limited to authorised employees, contractors, and service providers who have a legitimate business need for it, and who are bound by confidentiality obligations.

Data Breach Notification

If we become aware of a security incident affecting your personal data, we will investigate, contain, and assess it in line with our internal Data Breach Response Procedure. Where a breach is likely to result in a risk to your rights, we will notify the Office of the Data Protection Commissioner within 72 hours of becoming aware of it. Where a breach is likely to result in a high risk to you personally, we will also notify you directly, without undue delay, explaining what happened, what data was involved, and what steps you can take to protect yourself.

If you believe your personal data may have been affected by a security incident, please contact us immediately at privacy@kinara.ke.

Cross-Border Transfer of Data

As an international safari camp, we may need to transfer your personal data outside Kenya — for example, to service providers, travel partners, or group companies located in other countries. Where we do so, we will ensure appropriate safeguards are in place in accordance with the Data Protection Act, such as confirming that the receiving country has adequate data protection laws, or putting in place contractual protections.

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;
- request correction of inaccurate or incomplete personal data;
- request deletion of your personal data, subject to certain legal exceptions;
- object to or restrict certain processing of your personal data, including for direct marketing;
- request the transfer of your personal data to another service provider (data portability);
- withdraw consent at any time, where processing is based on consent;
- lodge a complaint with the Office of the Data Protection Commissioner (ODPC).

To exercise any of these rights, please contact us at privacy@kinara.ke. We will respond to your request within the timeframes required by the Data Protection Laws.

Children's Privacy

Our Site is not directed at children, and we do not knowingly collect personal data from children without the consent of a parent or guardian. Where children's information is collected as part of a family booking, it is provided and consented to by an accompanying parent or guardian.

Third-Party Websites

Our Site may contain links to third-party websites that are not operated by us. We are not responsible for the privacy practices of these third parties, and we encourage you to review their privacy policies before providing any personal data.

Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices or applicable law. The updated version will be posted on our Site with a revised "Last updated" date. We encourage you to review this Policy periodically.

Contact Us and Complaints

If you have any questions, concerns, or requests regarding this Policy or how we handle your personal data, please contact us:

- Email: privacy@kinara.ke
- Post: Mara Eden Safari Camp Ltd, T/A Kinara, Argwings Kodhek Road, Hurlingham, P.O. Box 1939-00606, Nairobi, Kenya

If you are not satisfied with our response, you have the right to lodge a complaint with the Office of the Data Protection Commissioner, Kenya:

- Website: www.odpc.go.ke
- Email: info@odpc.go.ke