

PRIVACY POLICY

PERFORMING AND AUDIO-VISUAL RIGHTS SOCIETY OF KENYA (PAVRISK)

Last Updated: 19th January 2026

1. Introduction

1.1. PAVRISK values your privacy and is committed to protecting your personal data in accordance with the Constitution of Kenya, 2010, the Data Protection Act, 2019, and all other applicable data protection laws and regulations.

1.2. This Privacy Policy is intended to clearly explain how PAVRISK collects, uses, discloses, and safeguards personal data obtained through the PAVRISK Member Information Management System.(PAMIMS), website, and related digital services (the “Service”).

1.3. By accessing or using the Service, you acknowledge that you have read, understood, and agreed to the collection and use of personal data in accordance with this Privacy Policy.

2. Interpretation and Definitions

In this Privacy Policy, unless the context otherwise requires:

2.1. “Account” means a unique account created to enable a user to access the Service or parts thereof.

2.2. “PAVRISK”, “we”, “us”, or “our” refers to the Performing and Audio-Visual Rights Society of Kenya.

2.3. “Cookies” mean small texts or files that are placed on your device or any other device by the website, containing the details of your browsing history on the website.

2.4. “Device” means any device capable of accessing the Service.

2.5. “Personal Data” means any information relating to an identified or identifiable natural person.

2.6. “Service” includes the PAVRISK Member Information Management System (PAMIMS), website, and all related services.

2.7. “User” or “Member” means any person who accesses or uses the Service.

2.8. “Website” refer to the website of PAVRISK accessible from www.pavrisk.or.ke.

3. External Links

3.1. The Platform may contain links to third-party websites or resources. PAVRISK does not control, endorse, or assume responsibility for the content, privacy practices, or policies of third-party websites.

3.2. This Privacy Policy applies solely to personal data processed by PAVRISK. Users are encouraged to review the privacy policies of any third-party sites they visit.

4. User Consent

4.1. By using the Service and submitting personal data, you expressly consent to the collection, processing, storage, and disclosure of your personal data for lawful purposes connected to PAVRISK's mandate, including membership administration, licensing, royalty collection and distribution, communication, compliance, and system security.

4.2. Where processing is based on consent, you may withdraw such consent at any time by contacting PAVRISK. Withdrawal of consent may, however, affect access to certain services or functionalities.

5. Personal Data Collected

5.1. PAVRISK may collect the following categories of personal data:

- (a) Identification and Contact Information including name, national ID or passport number, postal and physical address, email address, telephone number, gender, and age;
- (b) Membership and Professional Information including membership number, category of rights holder, registered works, and licensing details;
- (c) Financial Information including bank account or mobile money details required for royalty distribution and payment records; and
- (d) Communication Data including correspondence, inquiries, and support requests.

6. Non-Personal and Technical Information

6.1. PAVRISK may automatically collect non-personal and technical information, including:

- (a) IP address, browser type, operating system, access times, and Platform activity logs; and
- (b) device identifiers and general location data.

7. Use of Personal Data

7.1. Personal data collected by PAVRISK shall be kept confidential and used strictly for legitimate purposes.

7.2. Such purposes include:

- (a) administration and management of membership accounts;
- (b) verification of rights ownership and entitlement;
- (c) licensing, invoicing, and royalty collection and distribution;
- (d) communication and service-related notifications;
- (e) fraud detection, audit, and risk management;

- (f) system performance, security, and improvement; and
- (g) compliance with legal, regulatory, and statutory obligations.

8. Disclosure of Personal Data

8.1. Disclosure of personal data shall be strictly in accordance with applicable law.

8.2. PAVRISK may disclose personal data to:

- (a) regulatory bodies and statutory authorities, including KECOBO and the Office of the Data Protection Commissioner;
- (b) courts, tribunals, or law enforcement agencies pursuant to lawful requests;
- (c) banks, mobile money providers, and payment processors;
- (d) third-party service providers engaged under confidentiality and data protection obligations; or
- (e) professional advisers such as auditors and legal counsel.

PAVRISK does not sell personal data to third parties.

9. Cookies and Similar Technologies

9.1. Our website may use cookies and similar technologies to enhance user experience and improve the functionality of the site. Cookies are small text files that are stored on your device when you visit our website. We may use different types of cookies, such as essential cookies that are necessary for the website to function properly, analytical cookies that help us understand how users interact with the site, and marketing cookies to personalize content and advertisements based on user preferences. By using our website, you consent to the use of cookies as described in our Privacy Policy. Users can manage their cookie preferences and choose to accept or reject certain cookies through their browser settings.

9.2. Users may control cookie preferences through browser settings, noting that disabling cookies may affect certain Platform features.

10. Information Security

10.1. PAVRISK is committed to maintaining the confidentiality, integrity and security of personal information and we will take all appropriate security measures to ensure that any personal information that is availed to us will be protected against loss, destruction and damage, and against unauthorized or accidental access, processing, erasure, use, transfer, modification, disclosure or other misuse.

10.2. We employ industry-standard security measures to protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include, but are not limited to:

- a) Data Encryption: We use encryption protocols to transmit and store sensitive data securely.

b) Access Control: Access to your personal information is restricted to authorized personnel only, based on the principle of least privilege.

c) Regular Audits: We conduct periodic security audits to identify and rectify potential vulnerabilities in our systems. These measures include access controls, data encryption where appropriate, and periodic system audits.

10.3. In the unfortunate event of a data breach that may compromise the security of your personal information, we will take all necessary steps to mitigate the impact and notify you promptly.

11. Data Subject Rights

11.1. Subject to applicable law, Users have the right to:

- access their personal data;
- request correction of inaccurate or incomplete data;
- request deletion or restriction of processing where legally permissible;
- object to processing based on legitimate interests;
- withdraw consent where processing is based on consent; and
- lodge a complaint with the Office of the Data Protection Commissioner.

11.2. Requests may be made through the Platform or via PAVRISK's official contact channels.

12. Securing your personal information

12.1. While we take utmost care to protect your personal information, it is essential for you to take certain precautions to safeguard your data. Please refrain from sharing sensitive information on public forums and avoid using weak passwords.

12.2. You should protect yourself against unauthorized access to your password and to your computer/device used to access our website.

12.3. You should always ensure that you sign off when finished using a shared computer/device.

13. Personal Data Retention

13.1. Personal data shall be retained only for as long as necessary to fulfil the purposes for which it was collected or as required by law.

13.2. Upon expiry of the retention period, data shall be securely deleted, anonymized, or archived.

14. Data Breach Notification

In the event of a personal data breach, PAVRISK shall take immediate steps to mitigate the impact and shall notify affected data subjects and relevant authorities in accordance with the Data Protection Act, 2019.

15. Automated Decision-Making

PAVRISK may use limited automated processes to support administrative and operational efficiency. No automated decision-making shall be undertaken in a manner that produces legal or significant effects on Members without appropriate safeguards.

16. Amendments to This Privacy Policy

16.1. PAVRISK reserves the right to amend this Privacy Policy from time to time. Material changes shall be communicated through the Platform or other appropriate means.

16.2. Continued use of the Service following such amendments constitutes acceptance of the revised Privacy Policy.

17. Inquiries and Complaints

17.1. We understand that you have the right to inquire about the personal information we collect, process, and store. We will make every effort to promptly and transparently respond to all legitimate inquiries related to personal data processing within the scope of applicable data protection laws.

17.2. If you believe that your personal information has been processed in a way that is not in accordance with this Privacy Policy or applicable data protection laws, or if you have concerns about our data handling practices, please contact us on our website. We will promptly investigate all complaints received regarding the handling of personal data. Our objective is to resolve any complaints in a fair and efficient manner. We will provide you with information about the progress and outcome of the investigation.

17.3. We may require proof of your identity and full details of your request before we can process your inquiry or complaint.

18. Contact Information

For questions, concerns, or requests relating to this Privacy Policy, please contact:

Performing and Audio-Visual Rights Society of Kenya (PAVRISK)
Through the Membership Platform or via the official contact membership@pavrisk.or.ke.

This Privacy Policy forms an integral part of PAVRISK's legal and regulatory compliance framework.