

# SERVERNAH CLOUD PRIVACY POLICY

Atlancis Technologies Limited - Version 2.0 - Effective Date: 24 February 2026 - Last Updated: 24 February 2026

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Effective Date	24 February 2026
Data Controller	Atlancis Technologies Limited, 5th Floor, Top Plaza, Kindaruma Road, Nairobi, Kenya
Contact	privacy@servernah.com   +254 20 513 2100
Governing Law	Kenya Data Protection Act 2019 and Laws of Kenya

This Privacy Policy ("Policy") describes how Atlancis Technologies Limited ("Atlancis", "Servernah", "we", "us", "our") collects, uses, stores, and protects personal data in connection with the Servernah Cloud platform and all related services, websites, portals, and applications (collectively, the "Services").

We are committed to protecting your privacy and handling your personal data responsibly and in full compliance with the Kenya Data Protection Act 2019 ("KDPA 2019") and all applicable data protection legislation. Atlancis Technologies Limited is registered as a Data Controller with the Office of the Data Protection Commissioner (ODPC) of Kenya.

By accessing or using Servernah Services, you acknowledge that you have read and understood this Policy. If you do not agree, please discontinue use of our Services.

## 1. Who This Policy Applies To

This Policy applies to:

- Visitors to servernah.com and related Servernah web properties
- Registered users of the Servernah Self-Service Portal (SSP)
- Prepaid and enterprise customers and their authorised users
- Prospective customers who contact us for information or a demo
- Any individual whose personal data Atlancis processes in connection with the delivery of Servernah Services

This Policy governs personal data about individuals. It does not apply to customer data (content, workloads, or data stored by customers on Servernah infrastructure), the handling of customer data is governed by the applicable Master Service Agreement (MSA) and Data Processing Agreement (DPA).

## 2. Personal Data We Collect

### 2.1 Data You Provide Directly

When you register for or use Servernah Services, we collect:

- Account registration details: full name, business name, email address, country of origin, phone number, and password
- Billing and payment information: billing address, KRA PIN (where required for VAT purposes), and payment transaction references processed via iPay Africa
- Identity verification documents where required for enterprise onboarding or KYC purposes
- Communications you send us via email, the Servernah MySupport portal, or live chat
- Survey responses, feedback, and any information you voluntarily provide to us

### 2.2 Data We Collect Automatically

When you use our Services, we automatically collect certain technical data:

- IP address, browser type, operating system, and device information
- Pages visited, features used, session duration, and clickstream data within the SSP
- API request logs including timestamps, endpoints called, and response codes
- Resource usage data: vCPU, RAM, storage, and bandwidth consumption tracked at 5-minute intervals for billing purposes
- Platform event logs and error reports for operational and security monitoring

### 2.3 Data We Receive From Third Parties

We may receive limited personal data from:

- iPay Africa: payment confirmation and transaction status data to validate credit top-ups
- Identity verification providers where used for enterprise customer onboarding
- Referral partners or agents where a customer is introduced to Servernah through an authorised channel

PURPOSE	LEGAL BASIS (KDPA 2019)	DATA USED
Creating and managing your Servernah account	Contract performance	Name, email, phone, password
Provisioning and delivering cloud services (IaaS, DBaaS, LBaaS, BaaS)	Contract performance	Account details, usage data
Processing credit top-ups and generating VAT invoices	Contract performance / Legal obligation	Billing details, transaction data
Tracking resource usage for billing accuracy	Contract performance	Usage metrics (5-min intervals)
Providing customer support via Servernah MySupport	Contract performance	Account data, support communications
Sending service-related notifications and alerts	Contract performance	Email address, phone number
Security monitoring, incident detection, and fraud prevention	Legitimate interests	IP addresses, access logs, usage patterns
Complying with legal and regulatory obligations (KRA, ODPC, law enforcement)	Legal obligation	As required by applicable law
Sending marketing communications about Servernah products and updates	Consent (opt-in)	Email address, name
Improving and developing the Servernah platform	Legitimate interests	Aggregated usage analytics

We will never use your personal data for purposes that are incompatible with those described above without first notifying you and, where required, obtaining your consent.

#### 4. Marketing Communications

If you have opted in to receive marketing communications, we may send you information about Servernah products, platform updates, events, and offers. You may withdraw your consent at any time by:

- Clicking the "Unsubscribe" link in any marketing email
- Updating your preferences in the Servernah SSP(Servernah IAM) under Account Settings
- Contacting us at [privacy@servernah.com](mailto:privacy@servernah.com)

Withdrawal of consent for marketing communications will not affect service-related communications, which are necessary for the delivery of your Services and cannot be opted out of while your account remains active.

#### 5. Who We Share Your Data With

##### 5.1 Service Providers and Sub-Processors

We share personal data with carefully selected third-party service providers who assist us in delivering Servernah Services. All such providers are contractually bound to process data only on our instructions and to appropriate data protection standards:

PROVIDER	PURPOSE	DATA SHARED
iPay Africa	Payment processing for credit top-ups	Billing details, transaction reference
Microsoft (Microsoft 365)	Business email and internal communications	Email content as processed
Odoo ERP	Finance, invoicing, and CRM integration	Billing and account information
iX Africa / ADC (Colocation)	Physical hosting of Servernah infrastructure	No direct personal data; infrastructure only
SendGrid / Email delivery	Delivery of transactional and service emails	Email address, message content

### 5.2 Legal Disclosure

We may disclose your personal data to third parties where required or permitted by law, including:

- In response to a valid court order, subpoena, or lawful request by a Kenyan government authority or law enforcement agency
- To the Kenya Revenue Authority (KRA) for tax compliance purposes
- To the Office of the Data Protection Commissioner (ODPC) in connection with regulatory oversight or a data breach notification under Section 43 of the KDPa 2019
- To protect the rights, property, or safety of Atlancis, our customers, or the public
- In connection with a merger, acquisition, or sale of all or part of Atlancis's business, provided the acquiring entity agrees to honour this Policy

### 5.3 What We Will Never Do

- Sell, rent, or trade your personal data to any third party for their own marketing purposes
- Share your personal data with any party not described in this Policy without your explicit consent
- Allow third parties to use your data for purposes other than those described here

## 6. Data Residency and International Transfers

Servernah is built on a sovereign cloud infrastructure. All customer data and personal data processed in connection with Servernah Services is stored and processed within Kenya, hosted across our colocation facilities at iX Africa Limited and Africa Data Centers (ADC), both located in Nairobi, Kenya.

We do not transfer personal data outside Kenya except in the following limited circumstances:

- Where a third-party service provider (such as Microsoft 365 or SendGrid) processes data in another jurisdiction, we ensure appropriate contractual safeguards are in place consistent with Section 48 of the KDPa 2019
- Where you have explicitly authorised a cross-border transfer in writing
- Where required by law

In all cases involving cross-border processing, we apply safeguards to ensure your data receives a level of protection consistent with Kenyan data protection law.

## 7. Data Security

We implement appropriate technical and organisational security measures to protect your personal data against unauthorised access, loss, misuse, alteration, or destruction. These include:

- AES-256 encryption for all data at rest across Servernah infrastructure
- TLS 1.3 encryption for all data in transit
- Multi-factor authentication (MFA) for all platform administrative access
- Role-based access control (RBAC) ensuring staff access only data necessary for their role
- 24/7 platform monitoring and intrusion detection
- Regular security audits and vulnerability assessments
- Immutable backup storage to protect against ransomware and accidental deletion

Whilst we take every reasonable precaution, no method of transmission over the internet is completely secure. We cannot guarantee absolute security, but we will notify you and the ODPC promptly in the event of a data breach that poses a risk to your rights and freedoms, in accordance with Section 43 of the KDPa 2019.

## 8. Data Retention

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected, or as required by applicable law. Our standard retention periods are:

DATA TYPE	RETENTION PERIOD	BASIS
Account registration data	Duration of account + 3 years	Contract and legal obligation
Billing and transaction records	7 years from transaction date	Tax and legal obligation (KRA)
Usage and resource consumption logs	90 days (operational) + 7 years (billing records)	Contract performance and legal obligation
Support communications (Servernah MySupport)	3 years from ticket closure	Legitimate interests
Security and access logs	12 months	Security and fraud prevention
Marketing preferences and consent records	Until consent withdrawn + 1 year	Consent and accountability
Data following account closure	Deleted within 30 days of closure (export window: 14 days)	KDPa 2019 data minimisation

## 9. Your Rights Under the KDP A 2019

As a data subject under the Kenya Data Protection Act 2019, you have the following rights. To exercise any of these rights, contact us at [privacy@servernah.com](mailto:privacy@servernah.com). We will respond within 21 days in accordance with the KDP A 2019.

RIGHT	WHAT THIS MEANS
Right of Access	Request a copy of the personal data we hold about you
Right to Rectification	Request correction of inaccurate or incomplete personal data
Right to Erasure	Request deletion of your personal data where there is no lawful basis for continued processing
Right to Restriction	Request that we limit processing of your data in certain circumstances
Right to Data Portability	Request your data in a structured, commonly used, machine-readable format
Right to Object	Object to processing based on legitimate interests, including for direct marketing
Right to Withdraw Consent	Withdraw consent at any time where processing is consent-based (this does not affect prior processing)
Right to Lodge a Complaint	Complain to the Office of the Data Protection Commissioner (ODPC) at <a href="http://odpc.go.ke">odpc.go.ke</a> if you believe your rights have been violated

## 10. Cookies and Tracking Technologies

The Servernah website and portal use cookies and similar tracking technologies to provide a functional and improved experience. A separate Cookie Policy is available at [servernah.com/cookie-policy](http://servernah.com/cookie-policy) and describes in detail the types of cookies used, their purpose, and how you can manage your cookie preferences.

In summary, we use:

- Strictly necessary cookies: required for the portal and SSP to function - cannot be disabled
- Functional cookies: remember your preferences and session settings
- Analytics cookies: help us understand how visitors use our website so we can improve it - used only with your consent

You can manage or withdraw your cookie consent at any time via the cookie preferences panel on the Servernah website.

## 11. Children's Privacy

Servernah Services are not directed at individuals under the age of 18. We do not knowingly collect personal data from minors. If you believe a minor has provided us with personal data, please contact us at [privacy@servernah.com](mailto:privacy@servernah.com) and we will take prompt steps to delete that data.

## 12. Links to Third-Party Websites

The Servernah website and portal may contain links to third-party websites or services. This Policy applies solely to Servernah. We are not responsible for the privacy practices of third-party sites and encourage you to review their privacy policies before providing any personal data.

## 13. Changes to This Policy

We may update this Policy from time to time to reflect changes in law, our practices, or Servernah's services. Where changes are material, we will notify you by email to the address registered on your account and post a notice in the Servernah SSP at least 14 days before the change takes effect. The "Last Updated" date at the top of this document will always reflect the most recent revision.

Continued use of Servernah Services after the effective date of any update constitutes your acceptance of the revised Policy.

## 14. Contact Us

For any questions, concerns, or requests relating to this Privacy Policy or your personal data, please contact our Data Protection contact point:

<b>DATA CONTROLLER</b>	Atlancis Technologies Limited
<b>ADDRESS</b>	5th Floor, Top Plaza, Kindaruma Road, Off Ngong Road, Nairobi, Kenya
<b>EMAIL</b>	<a href="mailto:privacy@servernah.com">privacy@servernah.com</a>
<b>PHONE</b>	+254 20 513 2100
<b>ODPC COMPLAINTS</b>	Office of the Data Protection Commissioner - <a href="http://odpc.go.ke">odpc.go.ke</a>