



JUST SUMMIT TRAILS

PRIVACY NOTICE

Last updated: September 2026

Just Summit Trails (Just Summit) is committed to respecting and protecting your privacy. This Privacy Notice explains how we collect and use your personal data, the circumstances in which we may share it, how we protect it and the rights and choices you have in relation to it.

This Privacy Notice applies where you visit or interact with our website or digital platforms, enquire about, register for or participate in a Just Summit experience, join our community, complete our surveys or feedback forms, communicate with us, or otherwise provide personal data to us.

We process personal data in accordance with the Constitution of Kenya, 2010, the *Data Protection Act*, 2019, the *Data Protection (General) Regulations*, 2021 and other applicable laws.

1. Who are we?

Just Summit Trails (“Just Summit”, “we”, “us”, or “our”) organises hiking, outdoor, wellness, recreational, travel and related experiences. For purposes of applicable data protection law, Just Summit is the data controller where we determine the purpose and means for which your personal data is processed.

2. Personal data we collect

The personal data we collect depends on how you interact with us and the particular experience or service involved.

We may collect:

- **Contact and identification information**, including your name, telephone number, email address, age or date of birth and where necessary, identification information required for access to a park, forest, accommodation facility or other destination.
- **Registration and participation information**, including the experience you have registered for, your participation history, transport arrangements, accommodation requirements, dietary requirements and other information reasonably necessary to organise your experience.
- **Health and emergency information**, including your emergency contact details and relevant information concerning allergies, medication, injuries, physical limitations, health conditions or other circumstances that may affect your participation or our ability to assist you in an emergency.
- **Payment information**, including amounts paid, payment status, transaction references, refunds, invoices and receipts.



- **Photographs, videos and other recordings**, created during Just Summit hikes, tours, event and other experiences.
- **Feedback and survey information**, including information you provide through Trail Voices, reviews, surveys, nominations, testimonials and other feedback initiatives.
- **Communications**, including information you provide when you communicate with us through our website, WhatsApp, telephone, email, social media or other communication channels.

We aim to collect only the personal data that we reasonably require for a specific purpose.

3. How we collect your personal data

We generally collect personal data directly from you make an enquiry, register for an experience, make a payment, complete a registration form, survey or feedback form, participate in a Just Summit experience, join one of our communication or community platforms, or communicate or otherwise interact with us.

We may also receive personal data from a parent or guardian, another person registering or making arrangements on your behalf, our service providers or other third parties where it is lawful and appropriate for us to do so.

Photographs, videos and other recordings may also be created during our experiences.

4. How we use your personal data

We may use your personal data to:

- Respond to your enquiries.
- Register you for and administer a Just Summit experience.
- Communicate meeting points, departure times, itineraries, safety information and other operational updates.
- Organise transport, accommodation, park or forest entry, permits and other services.
- Manage participant safety and respond to emergencies.
- Communicate with your emergency contact where reasonably necessary.
- Process payments and refunds and maintain appropriate financial records.
- Manage our relationship and communications with you.
- Administer our WhatsApp groups and other community platforms.
- Obtain feedback and improve our experiences.
- Communicate upcoming Just Summit experiences and activities where permitted.
- Create and publish appropriate content relating to our experiences.
- Investigate complaints, accidents, incidents or safety concerns.
- Establish, exercise or defend legal claims.
- Comply with our legal, regulatory, insurance and accounting obligations.

We will not collect or use your personal data merely because it may be useful to us at some unspecified future time.



5. Our reasons for using your personal data

We will only process your personal data where we have an appropriate legal basis for doing so. Depending on the circumstances, we may process your personal data:

- **With your consent**, including where consent is appropriate for particular marketing, photography or other activities.
- **To provide an experience or service you have requested**, including taking steps necessary to register you for and deliver a Just Summit experience.
- **To comply with a legal obligation** to which we are subject.
- **To protect your vital interests or those of another person**, particularly where information needs to be used in an emergency.
- **For our legitimate interests or those of another person**, where those interests are not overridden by your rights and freedoms.

Where we rely on consent, you may withdraw that consent at any time. Withdrawal of consent does not affect processing that was lawfully undertaken before the consent was withdrawn.

6. Health and other sensitive personal data

Some of the information you provide to us may constitute sensitive personal data, particularly information concerning your health.

Outdoor activities involve inherent risks and certain information may be important for your safety. We may therefore ask you to provide relevant information concerning allergies, medication, injuries, physical limitations, health conditions or other circumstances that may affect your participation or our ability to assist you in an emergency.

We will seek to collect only the information reasonably necessary for your safety and participation and will take additional care when handling it.

Access to health information will, as reasonably practicable, be restricted to persons who require it for safety or emergency purposes.

Where reasonably necessary to protect your health or safety, we may share relevant information with our guides, designated safety personnel, medical practitioners, emergency responders, park or forest authorities, your emergency contact or another person assisting in an emergency.

7. Photography, videography and media

Photography and storytelling form part of many Just Summit experiences. Photographers or videographers may therefore be present during our hikes, tours and other activities.

We will provide reasonable notice where photography or videography is intended to take place and where consent is required, provide an appropriate mechanism for obtaining it.

We will also provide a reasonable means for you to communicate your photography and publication preferences.

Subject to applicable law and your communicated preferences or consent, photographs and videos from our experiences may be used on our website, social media platforms, promotional materials, reports, presentations and other Just Summit communications.

Where you have informed us that you do not wish your identifiable image to be used for promotional purposes, we will take reasonable steps to respect that preference.

Given the nature of outdoor and group activities, it may not always be possible to prevent a person from appearing incidentally in every wide-angle, crowd or background image.

We will not knowingly use images of a participant receiving medical treatment, involved in an accident or experiencing significant distress as ordinary promotional content.

8. Children

We recognise that children are entitled to particular protection in relation to their personal data.

The best interests of the child principle will be a primary consideration in any decision we make concerning the collection, use, sharing or publication of a child's personal data.

Where a child participates in a Just Summit experience, registration and the provision of personal information shall ordinarily be undertaken by or with the involvement of a parent or lawful guardian.

We will seek to collect only the information reasonably necessary for the child's participation and safety.

We will also take additional care with photographs, videos, health information and other sensitive information relating to children.

We will not knowingly publish an identifiable individual photograph or video of a child for promotional purposes without appropriate consent or authorisation from the parent or guardian.

Where appropriate, photographs of children may instead be shared privately with their parent or guardian.

We will avoid unnecessarily publishing a child's full name, contact information, location or other information that could identify or expose the child to unnecessary risk.

Where there is a conflict between a commercial, promotional or operational interest of Just Summit and the privacy, safety or best interests of a child, the best interests of the child will take precedence.

9. WhatsApp and our community platforms

We may use WhatsApp and similar platforms to coordinate experiences and communicate with our community.

When you join a WhatsApp group, your telephone number, profile name, profile photograph and other information may be visible to other members depending on the platform and your privacy settings.



We encourage members of our community to respect each other's privacy. Contact information obtained through a Just Summit group should not be collected, shared or used for unrelated purposes without the person's permission.

Joining a group created for a particular experience does not, by itself, mean that you have agreed to receive marketing communications indefinitely or to remain in a general Just Summit community group.

10. Trail voices, surveys and feedback

We may invite you to share your experience and views through Trail Voices and other surveys, reviews or feedback initiatives.

Participation is voluntary unless we expressly inform you otherwise.

We primarily use this information to understand our community, evaluate our experiences and improve future Just Summit experiences.

Where appropriate, survey findings may be aggregated or anonymised before they are shared publicly.

If you nominate, identify or comment on another participant through a feedback initiative, your submission does not by itself authorise us to publicly disclose personal information concerning that participant.

11. Who we share your personal data with

We do not sell your personal data.

Where reasonably necessary to organise or deliver our experiences, we may share relevant personal data with:

- Guides and safety personnel.
- Medical and emergency personnel.
- Photographers and videographers.
- Transport providers.
- Park, forest and conservation authorities.
- Accommodation and tour service providers.
- Payment service providers.
- Technology, hosting and communication service providers.
- Insurers.
- Professional advisers.
- Public authorities where disclosure is required or permitted by law.

We seek to share only the personal data reasonably necessary for relevant purpose. For example, a transport provider may require passenger information to provide transport but would not ordinarily require access to your health information.

Where a service provider processes personal data on our behalf, we will take reasonable steps to ensure that appropriate confidentiality and data protection safeguards apply.

12. Personal data about others

You may sometimes provide us with personal data relating to another person. This may occur, for example, where you provide the details of an emergency contact, register another participant, provide information concerning your child or nominate another participant through one of our feedback initiatives.

Where you provide another person's personal data to us, you should ensure that you are authorised to provide that information and where appropriate, that the person is aware of how their information will be used.

We will use personal data about another person only for the relevant purpose for which it was provided or as otherwise permitted by law.

13. Security

We take reasonable technical and organisational measures to protect your personal data against accidental or unlawful loss, destruction, alteration, unauthorised disclosure, access or misuse.

The measures we use depend on the nature and sensitivity of the information and may include access restrictions, password protection, secure storage, confidentiality requirements and controls over the sharing and publication of personal data.

While we take reasonable precautions, no method of electronic storage or transmissions can be guaranteed to be completely secure.

14. Where your personal data is held

Your personal data may be stored electronically or physically by Just Summit and by service providers that support our operations.

Some of the digital platforms, cloud services, communication tools or other technology providers we use may store or process personal data outside Kenya.

Where personal data is transferred outside Kenya, we will take reasonable steps to ensure that the transfer is made in accordance with applicable data protection law and that appropriate safeguards are in place.

15. How long we keep your personal data

We keep personal data only for as long as reasonably necessary for the purpose for which it was collected or where continued retention is required or permitted for legal, accounting, tax, insurance, safety, dispute resolution or other legitimate purposes.

Different categories of personal data may therefore be retained for different periods.

When personal data is no longer reasonably required, we will take appropriate steps to delete, destroy or anonymise it.

16. Your rights

Subject to applicable law, you have rights in relation to your personal data, including the right to:

- To be informed about how your personal data is being used.
- Request access to personal data we hold about you.
- Object to the processing of all or part of your personal data.
- Request correction of inaccurate, false or misleading personal data.
- Request deletion of personal data where applicable.
- Request restriction of processing where applicable.
- Receive your personal data in a portable format where applicable.
- Withdraw consent where our processing is based on your consent.

17. Direct marketing

We may communicate with you about upcoming hikes, tours, events, merchandise and other Just Summit activities where we have an appropriate legal basis to do so.

Where required, we will obtain your consent before using your personal data for direct marketing.

You may ask us to stop sending you direct marketing communications at any time. We will provide a simple means of opting out of such communications.

Opting out of marketing will not prevent us from sending information necessary to administer an experience for which you have registered, process a transaction, address a safety issue or otherwise fulfil an existing obligation to you.

18. Cookies

Our website may use cookies and similar technologies to enable certain website functions, understand how visitors interact with our website and improve the online experience.

Where required, we will provide further information about the cookies we use and give you appropriate choices regarding non-essential cookies.

You can also control certain cookies through your browser settings.



19. Links to third-party websites and platforms

Our website, social media pages or communications may contain links to websites, platforms or services operated by third parties.

Those third parties have their own privacy practices and we are not responsible for how independent third parties process personal data collected directly by them.

We encourage you to review their privacy notices before providing personal data to them.

20. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our activities, technology, legal requirements or data protection practices.

The most current version will be made available on our website and the 'Last updated' date at the beginning of this Notice will be revised accordingly.

Where a change materially affects how we use your personal data, we will take reasonable steps to bring the change to your attention where appropriate.

21. How to contact us

If you have any questions about this Privacy Notice, wish to exercise any of your data protection rights or have a concern about how we have handled your personal data, please contact:

Just Summit Trails

Email: justsummittrails@gmail.com

Tel. No.: +254713846603

We will endeavour to respond to privacy enquiries and requests within the timelines required by the applicable law.

You also have a right to lodge a complaint with the Office of the Data Protection Commissioner of Kenya if you believe that your personal data has been processed contrary to applicable data protection law.

Mostly Stories. Your data is still yours



Just Summit Trails

Adventure. Community. Conservation. Conversation.