

Data Protection and Privacy Statement

Koa Impact Ghana Limited

Last updated	5th May 2026
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Organization	Koa Impact Ghana Limited
Responsible Person	Data Protection Supervisor/ HRAD
Register of Systems	It means a register of all systems or contexts in which personal and organizational data is processed by Koa Impact Ghana Limited.

Koa Impact Ghana Limited is a company focused on upcycling the cocoa fruit to reduce food waste and provide additional income to cocoa farmers in Ghana. This Privacy notice describes how we process your Personal Data, your rights in relation to the Personal Data Processing, and our commitment to process your Personal Data in a fair, lawful, transparent, ethical and secure manner.

Who does this notice apply to?

This notice applies to:

–	any person(s) who contracts with us for the provision of services
–	any person(s) who use(s) our website, or services (“users”);

–	all suppliers, contractors and service providers of Koa Impact Ghana Limited including potential suppliers;
–	Koa applicants, recipients, and partners and:
–	any other persons (save for employees and job applicants) who share Personal Data with Koa, including all Data Subjects.

Important terms you need to understand when reading this notice

Data Subject	Means an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. It shall also include any additional persons afforded data privacy rights and protection of Personal Data in terms of the Data Protection Act, 2012 (Act 843) and any other Applicable Data Privacy Law.
Local Regulatory Requirements	Legal, statutory, regulatory, license conditions, rules, guidelines, Ministerial/National Security orders or directives, and Directives relating to Public safety (where applicable) and Data Sovereignty-related requirements with which Koa is required to comply. Data Sovereignty relates to the laws, restrictions,

	governance structures a country may impose on Personal Data that is processed within its jurisdictions.
Personal Data	"personal data" means data about an individual who can be identified, from the data, or from the data or other information in the possession of, or likely to come into the possession of the data controller;
Processing	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, including collection, receipt, recording, organisation, structuring, collation, storage; adaptation or alteration, updating, retrieval, consultation, use, dissemination, disclosure by means of transmission; or otherwise making available, alignment or combination, merging, restriction, erasure, destruction, and/or degradation.
Special Personal Data	"special personal data" means personal data which consists of information that relates to the race, colour, ethnic or tribal origin of the data subject; the political opinion of the data subject; the religious beliefs or other beliefs of a similar nature, of the data subject; the physical, medical, mental health or mental condition or DNA of the data subject; the sexual orientation of the data subject; (f) the commission or alleged commission of an offence by the

	individual; or (g) proceedings for an offence committed or alleged to have been committed by the individual, the disposal of such proceedings or the sentence of any court in the proceedings;
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What Personal Data does Koa collect and use?

Koa Impact Ghana Limited collects and processes personal data relating to individuals it engages with in the course of its operations. This includes personal data of cocoa farmers and suppliers (such as names, contact details, identification information, farm and payment details), employees and job applicants (including identification, contact, employment, payroll and qualification information), contractors and service providers, business partners, and visitors to its offices or digital platforms. Koa may also collect limited technical or usage data where individuals interact with its websites or digital systems. All personal data collected is processed lawfully, fairly, and transparently, and only for specified, explicit, and legitimate business purposes in accordance with applicable data protection laws.

We only collect Personal Data that is **adequate, relevant, and limited** to what is necessary in relation to the specific purposes described in this Privacy Notice.

1. Farmers and Suppliers

- **Identity and contact information:** full name, date of birth, gender, nationality, phone number, residential address, identification numbers (such as national ID where applicable).

- **Farm and production data:** farm location, farm size, crop information, traceability records, delivery volumes, and sustainability or certification data.
- **Financial and payment information:** mobile money or bank account details, transaction and payment records.
- **Training and engagement records:** participation in training programs, attendance records, feedback, and performance indicators.

2. Employees and Job Applicants

- **Employment and recruitment data:** names, contact details, CVs, employment history, qualifications, references, and performance records.
- **Legal and compliance information:** identification documents, work permits, tax and social security information.
- **Payroll and benefits data:** bank account details, salary, allowances, and statutory deductions.
- **Health and safety information:** occupational health data where required for workplace safety.

3. Contractors, Service Providers, and Business Partners

- **Contact and professional details:** name, role, organization, email address, phone number.
- **Contractual and compliance information:** agreements, invoices, payment records, and due diligence documentation.

4. Website, Digital Platform, and Communication Data

- **Technical and usage data:** IP address, device information, login credentials, access logs, and system usage data.
- **Communications data:** correspondence via email, phone, or digital platforms.
- **Social media interactions:** information you choose to share when engaging with Koa's official social media channels, subject to your privacy settings.

Where Does Koa Collect Personal Data From?

Koa collects Personal Data from a variety of sources depending on the nature of its relationship with you. This includes:

- **Directly from you** when you register as a farmer or supplier, participate in training programs, deliver produce, apply for employment, enter into contracts, or communicate with us.
- **From third parties**, where lawful and appropriate, such as cooperatives, aggregators, certification bodies, financial service providers, business partners, or government authorities.
- **Through digital channels**, including our websites, mobile applications, and internal systems.

For What Purposes Does Koa Use Personal Data?

Koa collects and uses Personal Data for the following purposes:

1. Farmers and Suppliers

- To manage sourcing, traceability, and supply-chain operations.
- To facilitate payments and maintain accurate financial records.
- To provide training, support programs, and sustainability initiatives.
- To comply with legal, regulatory, and certification requirements.

2. Employees and Job Applicants

- To recruit, employ, and manage staff.
- To meet payroll, tax, and social security obligations.
- To ensure workplace health, safety, and security.
- To support training, performance management, and professional development.

3. Contractors and Business Partners

- To manage contractual relationships, procurement, and payments.
- To conduct audits, reporting, and compliance checks.

4. General Business and Legal Purposes

- To operate and manage Koa's business effectively.
- To comply with applicable laws, regulations, and obligations to regulators.
- To protect the security and integrity of our systems and operations.

- To safeguard Koa's legitimate interests while respecting the rights and freedoms of all data subjects.

Is Koa allowed to Process my Personal Data?

Yes. Koa processes your Personal Data based on the following lawful grounds, as appropriate under the Data Protection Act, 2012 (Act 843):

- **Performance of a Contract** – where processing is necessary to enter into or perform a contract with you.
- **Legal Obligation** – where we are required to process data to comply with applicable laws and regulations.
- **Legitimate Interests** – where processing is necessary for Koa's or a third party's legitimate interests, provided these are not overridden by your fundamental rights and freedoms to privacy.
- **Vital Interests** – where processing is necessary to protect your life, health, or safety, or that of another natural person.
- **Public Interest / Statutory Functions** – where processing is necessary for tasks carried out in the public interest, such as compliance with pensions, Paye, SSNIT, Withholding Tax, or law enforcement requirements.
- **Consent** – where you have freely given, specific, informed, and unambiguous consent. You may withdraw this consent at any time.

Processing of Special Personal Data

Where Koa processes Special Personal Data (such as data relating to racial or ethnic

origin, political opinions, religious or philosophical beliefs, health, sex life, or criminal behaviour), we will rely on one of the following lawful bases, as appropriate:

- You have given explicit consent for one or more specified purposes (you may withdraw such consent at any time).
- Processing is necessary to protect your vital interests or that of another natural person, and you are unable to give consent.
- Processing relates to information you have deliberately made public.
- Processing is necessary for the establishment, exercise, or defence of legal claims or when courts are acting in their judicial capacity.
- Processing is necessary for scientific, historical research, or statistical purposes, provided it is proportionate, respects your rights, and includes safeguards.
- Processing of data relating to criminal behaviour is carried out strictly in accordance with Act 843 and other applicable local regulations.

Does Koa Process my Personal Data automatically?

Koa does not subject you to automated decision-making processing unless

- appropriate measures have been taken to protect your legitimate interest; or
- the decision is based on your explicit consent;

How long does Koa keep my Personal Data?

We will not retain your Personal Data for any longer than is necessary for achieving the purpose(s) for which the Personal Data is Processed, unless:

—	retention of the Personal Data is required or authorised by the Data Protection Act, 2012 (Act 843) and any other applicable local law;
—	you have consented to the retention of the Personal Data; or
—	The Personal Data is required for historical, statistical or research purposes and provided that we have established appropriate safeguards against the Personal Data being used for any other purposes.

We ensure that Personal Data which is no longer required, or we are no longer authorised to retain, is as soon as reasonably practicable, de-identified or destroyed through secure means, alternatively through permanent erasure by appropriate and effective mechanisms.

Does Koa Transfer My Personal Data to Third Parties?

Koa Impact Ghana Limited may share Personal Data with third parties **only where it is necessary, lawful, and relevant to our business operations**, and always in accordance with the Data Protection Act, 2012 (Act 843). Where we share Personal Data, we ensure that appropriate technical and organizational safeguards are in place to protect the data.

We may share Personal Data with:

- **Service Providers and Professional Advisers**

Such as IT and system providers, hosting and cloud service providers, payment processors, auditors, legal advisers, consultants, training providers, and logistics or field service partners. These third parties process Personal Data **only on Koa's instructions**, under binding contractual obligations that require confidentiality and appropriate security measures. They are not permitted to use the data for their own purposes.

- **Business Partners and Supply-Chain Stakeholders**

Including cooperatives, aggregators, certification bodies, sustainability partners, and customers, where necessary for sourcing, traceability, sustainability reporting, audits, or contractual performance. Data shared is limited to what is relevant for the specific purpose.

- **Regulators, Courts, and Law Enforcement Authorities**

Where required to comply with applicable laws, regulatory requirements, official requests, investigations, or court orders.

- **Auditors, Inspectors, and Certification Bodies**

Who may require access to Personal Data to conduct financial, operational, sustainability, or compliance audits, inspections, or certifications.

- **Insurers and Financial Institutions**

Where necessary to arrange insurance cover, process claims, facilitate payments, or meet financial and risk management obligations. Any such recipients are required to handle Personal Data in line with legal and confidentiality requirements.

Koa **does not sell Personal Data** to third parties.

Does Koa Transfer Personal Data Outside Ghana?

Yes, in some cases Personal Data may be transferred outside Ghana, but **only where it is necessary and permitted under the Data Protection Act, 2012 (Act 843)**.

Any international transfer of Personal Data will take place only where:

- The recipient country or organization provides an adequate level of data protection; or
- There is a binding contractual agreement ensuring appropriate safeguards; or
- The transfer is required by law, necessary for the performance of a contract, for legitimate business purposes, or authorized by the Data Protection Commission.

Where possible, Koa applies **data minimization, anonymization, or pseudonymization** measures, particularly for reporting, sustainability disclosures, or engagement with international partners.

How does Kinder Paradise secure my Personal Data?

Koa Impact Ghana Limited takes the security of Personal Data seriously and is committed to protecting the confidentiality, integrity, and availability of all Personal Data in its possession or under its control. Koa applies appropriate and reasonable **technical, physical, and organisational safeguards** to protect Personal Data against:

- Accidental loss, damage, or destruction;
- Unlawful or unauthorised access; and
- Unlawful or unauthorised collection, use, disclosure, alteration, or processing.

Koa's security measures include:

Technical Safeguards

Password protection, role-based access controls, secure servers and cloud systems, data backups, encryption of sensitive data, and monitoring of system access and activity.

Physical Safeguards

Controlled access to offices and facilities, secure storage of physical records, restricted access to equipment, and visitor management procedures.

Organisational Safeguards

Confidentiality obligations for employees and contractors, data protection training and awareness, internal data protection policies and procedures, and limited access to Personal Data on a need-to-know basis.

Koa regularly assesses reasonably foreseeable internal and external risks to Personal Data and reviews its security controls to ensure they remain appropriate and effective.

How Does Koa Handle Personal Data Breaches?

If Koa becomes aware of, or reasonably suspects, a Personal Data Breach (including loss, theft, unauthorised access, or accidental disclosure of Personal Data), Koa will:

- Activate its incident management and response procedures to promptly contain and investigate the breach;
- Take appropriate steps to mitigate potential harm to affected individuals;
- Notify the Data Protection Commission (DPC) where the breach poses a significant risk to the rights and freedoms of data subjects, in accordance with the Data Protection Act, 2012 (Act 843);
- Inform affected individuals where required or appropriate, providing relevant information and guidance; and
- Record the [incident](#) and implement corrective and preventive measures to reduce the risk of recurrence.

What are my rights?

If Koa is processing your Personal Data, you have the following rights under the **Data Protection Act, 2012 (Act 843)**:

1. **Right of Access and Correction**

- You may request access to the Personal Data we hold about you.
- You may request corrections if your data is inaccurate, incomplete, or out of date.

2. **Consent Rights**

- You have the right to **withhold consent** if we request it.
- You have the right to **withdraw your consent** at any time without negative consequences. If consent is withdrawn, we will stop processing your personal data unless another lawful basis applies.

3. **Right to Object**

- You may object to the processing of your personal data on grounds relating to your situation, particularly where processing is based on **legitimate interests** or **public interest**.
- If you object and we have no overriding legal grounds, we will stop processing your data.

4. **Right to Erasure / Disposal**

- You may request deletion of your Personal Data if we no longer have a lawful reason to keep it.
- Some records may need to be retained by law, especially for **child protection, employment, or financial reporting purposes**.

5. **Right to Restrict Processing**

- You may request that we temporarily limit the use of your Personal Data in certain cases (e.g., while accuracy is being verified or after an objection has been raised).

How to Contact Us

If you have any requests or questions about our privacy policy or practices, please submit your query to Koa at [**info@koa-impact.com**](mailto:info@koa-impact.com). We will take all reasonable steps to address your request if it is consistent with the Data Protection Act, 2012 (Act 843) and other applicable laws and internal policies.

If you feel that your questions or concerns have not been adequately dealt with or feel uncomfortable raising them with the local Data Privacy Office, you may also contact [**info@koa-impact.com**](mailto:info@koa-impact.com)

Finally, you always have the right to contact the Ghana Data Protection Commission whose contact details are:

— **[Postal Address: East Legon, Pawpaw Street, GPS: GA-414-1469, P.O. Box CT7195, Accra]**

— **[Email Address: info@dataprotection.org.gh]**

— **[Telephone number: +233256301533]**

— **[Website: www.dataprotection.org.gh]**

Changes to Privacy Policy Koa may modify this Privacy Notice from time to time to reflect our current privacy practices. When we make changes to this notice, we will revise the “effective” date at the top of this notice and any changes affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you

