

PRIVACY POLICY

MifugoCare, MifugoDigital Platform, and Affiliated Platforms

Last Updated: 31 October 2026

IMPORTANT NOTICE — NO SERVER-SIDE DATA STORAGE

MifugoCare, MifugoDigital Platform, and any affiliated platforms do not store your personal data on their servers. All farm records, animal data, task history, milk production logs, weight records, and supply inventory are stored **locally on your device** — either in the app's private storage (Android) or in your personal iCloud private database (iOS).

There is no MifugoDigital-owned database, cloud server, or backend service that receives, stores, or processes your personal data. When you use Google Sign-In or Apple Sign-In, your authentication credentials are handled directly by Google or Apple respectively; MifugoDigital never receives or stores your password. The app functions fully offline and requires no MifugoDigital account to operate.

1. WHO WE ARE

This Privacy Policy is issued by **Klaxon Digital Solutions** ("we", "us", "our"), the developer of MifugoCare and the MifugoDigital Platform, registered in Nairobi, Kenya.

For the purposes of the **Kenya Data Protection Act, 2019 (Act No. 24 of 2019)** ("the DPA"), Klaxon Digital is a **Data Controller** only to the extent that it determines the purposes and means of processing personal data. Because MifugoCare operates entirely on your device and transmits no personal data to Klaxon Digital, Klaxon Digital does not receive, hold, or process your personal data on any server it controls.

Contact for privacy matters:

- Email: privacy@klaxondigital.com

- Address: Braham Court, Dennis Pritt, Nairobi, Kenya
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2. DEFINITIONS

Terms used in this policy carry the meanings given in the DPA:

- **Personal Data** means any information relating to an identified or identifiable natural person.
 - **Sensitive Personal Data** means data revealing race, health status, ethnic or social origin, conscience, belief, genetic data, biometric data, property details, marital status, family details, sex, or sexual orientation.
 - **Processing** means any operation performed on personal data, including collection, storage, retrieval, use, disclosure, or erasure.
 - **Data Subject** means the identified or identifiable person to whom personal data relates.
 - **Data Controller** means the person or entity that determines the purpose and means of processing personal data.
 - **Data Processor** means a person or entity that processes personal data on behalf of a Data Controller.
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3. WHAT DATA THE APP PROCESSES

MifugoCare processes the following categories of data **entirely on your device**:

Category	Examples	Where it is stored
Animal records	Name, breed, stage, location, tag number, date of birth, photograph	Device storage (Android) / iCloud private database (iOS)

Category	Examples	Where it is stored
Task records	Task type, scheduled time, completion status, assignee, notes	Device storage / iCloud private database
Production records	Milk volumes, weight measurements, supply usage	Device storage / iCloud private database
Supply records	Inventory names, stock levels, unit costs, restock history	Device storage / iCloud private database
Account identifiers	Name and email address obtained via Google Sign-In or Apple Sign-In (if you choose to sign in)	Device storage only; never transmitted to Klaxon Digital
Farm profile	Farm name, location, size (if you choose to add a farm)	Device storage only

No data is transmitted to Klaxon Digital servers at any time. The app does not operate any remote logging, analytics, crash reporting, or telemetry service that transmits personal data off your device.

4. HOW DATA IS STORED — THE LOCAL-FIRST ARCHITECTURE

4.1 Android

On Android, all data is stored in the app's private `SharedPreferences` storage, which is accessible only to MifugoCare and is encrypted by the Android operating system at rest. If you sign in with Google, your name and email are stored locally alongside your farm data. No data leaves the device.

4.2 iOS

On iOS, all data is stored in the app's local container and — if you have iCloud Drive enabled — in your **personal iCloud private database**. This database is provisioned and controlled by Apple under your Apple ID. Klaxon Digital does not have access to your iCloud private database and cannot read, retrieve, or delete data stored there. Apple acts as the infrastructure provider; Apple's privacy terms govern the iCloud storage itself.

4.3 No MifugoDigital server

MifugoCare does **not** connect to any server operated by Klaxon Digital or MifugoDigital. There is no registration with a MifugoDigital backend, no account creation on a MifugoDigital server, and no synchronisation to a MifugoDigital database. The only network calls the app makes are:

1. **Google Sign-In** (Android) — handled by Google Play Services, under Google's privacy policy.
2. **Apple Sign-In** (iOS) — handled by Apple, under Apple's privacy policy.
3. **CloudKit sync** (iOS, optional) — handled by Apple, within your own iCloud account.

If you do not use any of these optional features, the app operates with **zero network calls**.

5. LAWFUL BASIS FOR PROCESSING

Under **Section 25 of the DPA**, personal data must be processed lawfully, fairly, and transparently. The lawful bases for the processing described in this policy are:

Processing activity	Lawful basis
Storing farm records on your device	Performance of a contract — you are using the app to manage your farm, and local storage is essential to that function
Optional Google or Apple Sign-In	Consent — you choose to sign in; you may use the app without signing in
Optional iCloud sync (iOS)	Consent — iCloud is enabled at the operating system level by you
Storing animal health data	Consent — you enter this data voluntarily; the app does not require it to function

Animal health data may constitute **sensitive personal data** under the DPA because it relates to health status. We do not process sensitive personal data on any server. It is stored only on your device under your control.

6. DATA SHARING

6.1 No sharing with Klaxon Digital

We do not receive, collect, or have access to your personal data. There is nothing for us to share.

6.2 Platform providers

If you use Google Sign-In or Apple Sign-In, the respective platform processes your authentication credentials under its own privacy policy. We do not receive your password. If you use iCloud sync, Apple stores your data under your Apple ID. We cannot access it.

6.3 No third-party analytics, advertising, or tracking

MifugoCare contains **no** third-party analytics SDKs, **no** advertising SDKs, **no** tracking libraries, and **no** crash reporting services that transmit personal data. The app does not track you across other apps or websites.

6.4 Legal disclosure

Because we hold no personal data on any server, we have nothing to disclose in response to a legal request. If you store data locally on your device, that data is accessible only to you and to anyone you grant physical access to your device.

7. DATA RETENTION

Under **Section 25(1)(g) of the DPA**, personal data must be kept in a form that identifies data subjects for no longer than is necessary for the purpose for which it was collected.

Because MifugoCare stores data **only on your device**, you control retention entirely:

- **Delete a task, animal, supply, or record** — it is removed immediately from local storage.
- **Delete the app** — all app data is removed from the device by the operating system.
- **Sign out** — your locally stored name and email are cleared, while farm records remain (unless you delete them).
- **iCloud (iOS)** — your iCloud backup retention is governed by your Apple ID settings.

We retain **no** data on any server, so there is no server-side retention period to disclose.

8. YOUR RIGHTS AS A DATA SUBJECT

Under **Section 26 of the DPA**, you have the right to:

Right	How to exercise it in MifugoCare
To be informed of how your personal data is used	This Privacy Policy is the notice required by the DPA
To access your personal data	All your data is visible in the app; there is no hidden server copy
To object to processing	You may stop using the app, sign out, or delete the app at any time
To correction of false or misleading data	Edit any record directly in the app
To deletion of false or misleading data	Delete any record directly in the app, or uninstall the app to remove all data
To withdraw consent (where processing is based on consent)	Withdraw by disabling iCloud sync, signing out, or deleting the app

Because there is no server-side data, every right is exercisable **directly within the app** or by operating-system-level actions (uninstall, sign-out). You do not need to submit a subject access request to Klaxon Digital, because we hold no personal data to disclose.

9. SECURITY SAFEGUARDS

Section 41 of the DPA requires data controllers and processors to implement appropriate technical and organisational measures to protect personal data. MifugoCare's local-first architecture is itself the primary security measure: because no personal data leaves your device, the attack surface is limited to the device itself.

Additional safeguards built into the app:

- **Operating-system encryption at rest** — Android and iOS encrypt app storage by default.
- **App sandboxing** — the app's data is inaccessible to other apps on the device.

- **No server-side credential storage** — there is no MifugoDigital password database to breach.
- **Optional biometric or passcode lock** — available through your device settings.

Your responsibility: Because you hold the only copy of your data, you are responsible for device backups. On iOS, iCloud backup (if enabled) provides a recovery path. On Android, device backup is governed by your Google account settings. **If you lose your device without a backup, the data cannot be recovered by Klaxon Digital, because we never held a copy.**

10. CHILDREN'S DATA

MifugoCare is intended for use by adults managing a farm. The app does not knowingly process personal data of children under 18. Because the app stores data only on your device and does not transmit it to us, we do not create profiles of children and have no mechanism to collect children's data on a server.

11. CROSS-BORDER DATA TRANSFERS

Section 25(1)(h) of the DPA provides that personal data shall not be transferred outside Kenya unless there is proof of adequate data protection safeguards or consent from the data subject. **Section 49** imposes additional requirements for sensitive personal data.

Klaxon Digital does **not** transfer your personal data outside Kenya, because Klaxon Digital does not receive your personal data at all. Any cross-border storage that occurs is:

- **iOS iCloud sync** — data is stored in Apple's global iCloud infrastructure, under your Apple ID, subject to Apple's safeguards. You enable this by turning on iCloud for the app.
- **Google Sign-In (Android)** — authentication is processed by Google under Google's safeguards. No farm data is transmitted.

If you do not enable iCloud sync or Google Sign-In, no data crosses any border through MifugoCare.

12. DATA PROTECTION OFFICER AND COMPLAINTS

Data Protection Officer contact:

- Email: privacy@klaxondigital.com
- Postal: Klaxon Digital, Nairobi, Kenya

If you believe your data protection rights have been infringed, you have the right to lodge a complaint with the **Office of the Data Protection Commissioner (ODPC)**:

- **Email:** info@odpc.go.ke
- **Phone:** 020 780 1800
- **Hours:** Monday–Friday, 08:00–17:00

You may also complain directly to Klaxon Digital first, and we will respond within the timeframe required by the DPA.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy to reflect changes in the app, changes in law, or changes in regulatory guidance. The "Last Updated" date at the top of this page will change when an update is made. Because the app stores no contact list on a server, we cannot email you directly; material changes will be noted in the app's release notes on Google Play and the App Store.

14. SUMMARY — THE ESSENTIAL POINTS

Question	Answer
Does MifugoCare store my data on a MifugoDigital server?	No. All data is stored on your device.
Does MifugoDigital Platform store my data on a server?	No. The platform operates locally-first.
Do affiliated platforms receive my data?	No. No affiliated platform receives data from MifugoCare.
Who can see my farm records?	Only you, and anyone with physical access to your unlocked device.
Can Klaxon Digital recover my data if I lose my device?	No. We hold no copy. Back up your device.
Do you use analytics or advertising SDKs?	No. The app contains no analytics, advertising, or tracking libraries.
Is my data transferred outside Kenya?	Only if you enable iCloud (iOS) or Google Sign-In (Android), and then only through Apple or Google under their policies. Klaxon Digital transfers nothing.

Klaxon Digital Solutions

Nairobi, Kenya

31 October 2026