

Module 2: Data Subject Rights and Obligations

Learning Outcomes:

- Recognize data subject rights Truehost must honor.
- Learn how Truehost handles data subject requests efficiently.
- Understand Truehost's obligations in facilitating these rights.

Rights of Data Subjects

1. Who is a Data Subject?

A **data subject** is any individual whose personal data is collected, processed, or stored by a data controller or processor. For Truehost, this includes:

- Customers using Truehost's services (e.g., hosting accounts, domain registrations).
- Website visitors whose data (e.g., IP addresses, cookies) may be processed.

2. Rights of Data Subjects Under the Kenya Data Protection Act:

a. Right to Access and Update Data:

- Customers can access and update their personal information through the **Truehost client area portal**, including:
 - Contact details (e.g., email, phone number).
 - Billing information.
- Example: A customer updating their billing address before renewing a hosting service.

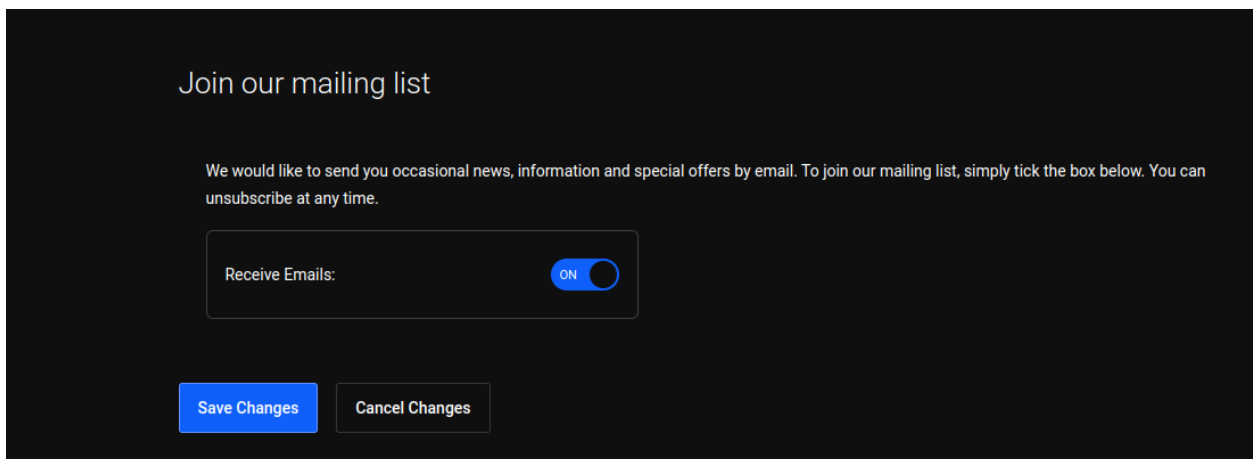
b. Right to Data Erasure:

- Customers may request deletion of personal data, such as:
 - Account closure.
 - Account Deletion
- **Limitations:** For domain WHOIS data, Truehost must comply with registrar and ICANN regulations, which may restrict full data erasure.
 - **Example:** WHOIS records may still display anonymized registrant data even after a deletion request. This may apply if the regulation does not support deletion of a domain name that is connected to the data in question.

c. Right to Object to Processing:

- Customers can object to specific data processing activities, such as:
 - Receiving marketing emails.
 - Sharing data with third parties (e.g., for targeted advertising).
- Truehost provides options to opt out of such processing while ensuring essential services remain unaffected.

Example as attached below: A Customer can easily enable or disable receiving marketing emails.



Join our mailing list

We would like to send you occasional news, information and special offers by email. To join our mailing list, simply tick the box below. You can unsubscribe at any time.

Receive Emails:

[Save Changes](#) [Cancel Changes](#)

Truehost's Responsibilities

1. What Are Truehost's Responsibilities?

Truehost, as a data controller and processor:

- Enables data subjects to exercise their rights easily and transparently.
- Protects personal data from unauthorized access, use, or disclosure.
- Comply with legal and regulatory obligations under the Kenya Data Protection Act.

2. Providing Clear, Accessible Information on Rights:

- **Truehost Client Area:** Ensures the platform includes intuitive options for customers to:
 - Update contact and billing information.
 - Opt in or out of data usage options (e.g., marketing emails and SMS).
- **Support Channels:** Training of support staff is done to handle data requests effectively and guide customers through the process.

3. Addressing Data Subject Requests Promptly:

- Establishes defined timelines for responding to requests:
 - Data access or update requests: As soon as Possible
 - Erasure requests: Hosting Data and Account closure/deletion- As soon as possible (Except Active Domain Names).
 - Maintain logs of all requests and resolutions for compliance and audit purposes.
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Truehost Privacy Policy Review

1. Transparency in Truehost's Terms of Service and Privacy Policy:

- **Terms of Service:** Clearly outlines:
 - How personal data is collected, stored, and used.
 - Customer responsibilities in providing accurate information.
 - Limitations on data erasure for domain-related compliance.
 - Reference: [Truehost Terms of Service](#).
- **Privacy Policy:** It includes some of the below:

- A list of data collected and its purposes.
 - Details of third-party sharing (e.g., registrars, payment processors, service providers).
 - How customers can contact Truehost for privacy-related inquiries.
 - How to request for data deletion.
 - Reference: [Truehost Privacy Policy](#).
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Case Studies

1. Handling a Data Access Request via Support:

- **Scenario:** A customer requests access to their account history, including billing records and domain registrations.
- **Steps:**
 - Verify the customer's identity .
 - Extract relevant data from internal systems.
 - Deliver the data securely

2. Managing a 'Right-to-Delete' Request of Accounts:

- **Scenario:** A customer requests deletion of an active/inactive account.
 - **Steps:**
 - Review the account to ensure no active services or unpaid balances exist.
 - Archive necessary data for regulatory compliance (e.g., payment records).
 - Delete all non-essential data, including personal details and logs.
 - Confirm the deletion to the customer.
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