

**Kassaba**

# COMPLIANCE MEMORANDUM

Personal Data Protection · Moroccan Law 09-08 / CNDP

Official document

kassaba.ma

Document: **CNDP Compliance Memorandum** Reference: **Law 09-08 · Delib. 236-2015** Source: **Kassaba.ma****Date:** June 10, 2026 **Audience:** syndics and co-owners **Contact:** support@kassaba.ma

## 1. Purpose of this document

This memorandum answers a legitimate question any co-owner is entitled to ask: is the personal data managed through the Kassaba platform processed in compliance with Moroccan Law No. 09-08 on the protection of individuals with regard to the processing of personal data, under the supervision of the CNDP (the Moroccan National Commission for the Protection of Personal Data)?

It may be freely shared with co-owners, conseils syndicaux and general assemblies.

## 2. Status of the CNDP file

Kassaba falls under the standard declaration regime (form F211). After legal analysis: Kassaba processes no sensitive data within the meaning of Article 12 of Law 09-08 (no health data, opinions, beliefs or convictions records), does not collect co-owners' CIN numbers, and performs no file interconnection. No prior authorization is therefore required: a declaration is sufficient.

The complete file has been prepared and includes:

- A standard F211 declaration covering the entire processing operation (purposes, data, security, data subject rights).
- Four F118 requests declaring transfers to technical subcontractors (hosting and notifications, detailed in section 4).
- An internal processing register and a detailed technical annex.

**Status as of June 10, 2026:** file finalized, deposit with the CNDP in progress. This memorandum will be updated with the receipt numbers upon reception.

## 3. What data, for what purposes

Kassaba processes only the data necessary for the lawful management of a co-ownership under Law 18-00 and Decree 2.23.700:

Category	Data	Purpose
Identity	Last name, first name, title	Identifying the co-owner and their lot
Contact	Email, phone, address	Charge calls, AG convocations, reminders
Property	Lot number, tantiemes	Charge calculation per the co-ownership bylaws



Financial	Charges called, payments, balance	Accounting and Decree 2.23.700 annexes
Documents	AG minutes, invoices, receipts	Legal archiving and transparency

**What Kassaba does not process:** no sensitive data (health, religion, opinions, convictions), no CIN numbers, no resale of data, no advertising, no sharing with any third parties other than the declared technical subcontractors below.

#### 4. Where the data is hosted

Data is hosted in Germany with Hetzner Online GmbH, one of Europe's largest hosting providers: founded in 1997, operating hundreds of thousands of servers in ISO 27001 certified data centers. In practice, co-owners' data lives under German and European data protection law (GDPR), among the strictest in the world, in a country the CNDP officially recognizes as ensuring an adequate level of protection (Deliberation No. 236-2015 of December 18, 2015).

Declared technical subcontractors (each via an F118 form):

Subcontractor	Role	Country	Why this provider	Legal basis
Hetzner Online GmbH	Infrastructure hosting	Germany	ISO 27001 certified, high availability, German/EU data protection standards	Adequate country (delib. 236-2015)
Google Ireland Ltd	Transactional emails	Ireland	Reliable email delivery; data region configured in Europe	Adequate country (delib. 236-2015)
Apple Inc. (APNs)	iOS push notifications	United States	Technical necessity: the only channel Apple allows for iOS notifications	Standard Contractual Clauses (SCC)
Google LLC (FCM)	Android push notifications	United States	Technical necessity: the standard channel for Android notifications	Standard Contractual Clauses (SCC)

Push notifications never contain personal data: only a generic message is sent, and details are displayed only after opening the authenticated application.

#### 5. Security measures

- Communications encrypted with TLS 1.2 minimum; disks encrypted with AES-256: the same encryption standards used in online banking.
- Role-based access control (RBAC): each user sees only what their role allows; two-factor authentication for administrators.
- Daily encrypted backups, retained 30 days, restoration tested quarterly.
- Access logs retained for 12 months.
- Commitment to notify any security incident within 72 hours.



## 6. Co-owners' rights

In accordance with Articles 7 to 9 of Law 09-08, every data subject has a right of access, rectification and objection regarding their data. In practice:

- Co-owners view and correct their information directly in their personal space (web or mobile app).
- Any request can also be sent to [support@kassaba.ma](mailto:support@kassaba.ma): the contact is stated in the privacy policy and in the footer of every email.
- Consent is collected explicitly at registration (terms of service and privacy policy, with timestamp).

## 7. Retention periods

Data	Period	Basis
Accounting data	10 years	Law 9-88, Article 22 (Moroccan accounting standard)
Charge receivables	5 years from the date the AG approved the charges concerned	Law 18-00, Article 43
Technical logs	12 months	Security and traceability
After termination	30 days, then legal accounting archive, then permanent deletion	Kassaba retention policy

## 8. Division of roles

The syndic remains the data controller for their co-ownership's data: the syndic decides what data is entered and who can access it. Kassaba acts as a technical data processor within the meaning of Law 09-08: the platform hosts and processes data solely on the syndic's instructions.

A Data Processing Agreement (DPA) formalizing these commitments is available to every syndic client on request.

## 9. Commitment

Kassaba is committed to maintaining this compliance over time: updating the CNDP file whenever the processing evolves, informing syndic clients of any change of subcontractor, and full transparency towards the co-owners whose data is managed through the platform.

For any question regarding this memorandum: [support@kassaba.ma](mailto:support@kassaba.ma)

