



## BIOMETRIC INFORMATION PRIVACY NOTICE

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### 1. Introduction

KCA University is registered as a Data Controller with the Office of the Data Protection Commissioner (ODPC) (Identification: 349-5820-E44E), and we are committed to ensuring that the data we process is handled in accordance with data protection law.

### 2. Purpose of Processing

KCA University (“KCAU” or “the University”) may use biometric identification systems to increase security and control access to certain campus facilities. The University recognizes the sensitivity of Biometric Data and takes seriously its obligations to maintain the confidentiality, integrity, and availability of this data in accordance with the Data Protection Act, 2019, as provided under Sections 25 and 45.

### 3. Legal basis for Data Processing

The Data Protection Act, 2019 provides a number of different legal bases under which the processing of personal data may take place. In this case, the following threshold must be met:

#### a. Consent

KCA University will not collect or otherwise obtain any individual’s Biometric Data without prior obtained consent of the individual. The consent form (herein provided) will inform the individual of the specific reason(s) the Biometric Data is being collected and the length of time the data will be stored.

### 4. What information do we collect from you?

As part of our services, we may collect specified biometric data to provide you with a seamless and secure experience. Biometric data refers to unique physical or behavioral characteristics that can be used to identify an individual, such as fingerprints, facial patterns, and voiceprints. The specific type of biometric data we may collect from you is:

- a. **Fingerprint Scans:** We may collect and store your fingerprint patterns to enable secure access to certain features or areas within our campus.

### 5. When may we obtain your personal data?

We may only collect your biometric data when you explicitly provide us with your consent. This could involve your agreement through written consent forms or, online consent processes, depending on the circumstances and legal requirements.

#### **6. Who else do we pass this information on to?**

The University will not disclose or disseminate any Biometric Data to any third party unless:

- a. Disclosure is in compliance with any legal obligation to which the University is Subject [to](#)
- b. Disclosure is required pursuant to a valid warrant issued by a court of competent jurisdiction;
- c. The disclosed data completes a financial transaction requested or authorized by the student, employee, or other constituent; or
- d. The student, employee, or other constituent has consented to such disclosure or dissemination.

#### **7. Do we transfer the information overseas?**

We do not transfer information overseas unless there is adequate protection in place although we do not anticipate the transfer of such data overseas in any case.

#### **8. How long do we keep this information for?**

The University will permanently destroy an individual's Biometric Data within six (6) months when:

- a. The employee's employment is terminated;
- b. The student graduates or otherwise leaves the University;
- c. The employee transfers to a position for which the Biometric Data is not used; or
- d. The University no longer uses the Biometric Data.

#### **9. What are your rights as a data subject?**

In respect of that personal data; you have the right:

- To access your personal data that, we process;
- To rectify inaccuracies in personal data that we hold about you if it is inaccurate or incomplete;
- To request the deletion or removal of your personal data where there is no compelling reason for its continued processing;
- To restrict the processing of your personal data in certain ways;

- To obtain your personal data for reuse;
- To object certain processing of your personal data

## 10. Where can I get more information?

For more information, please contact the University's Data Protection Officer, [dpo@kcau.ac.ke](mailto:dpo@kcau.ac.ke), KCA University, Main Campus, Ruaraka.

## 11. Complaints

If you wish to raise a complaint how we have handled your personal data, you can contact the University Data Protection Officer who will investigate the matter.

Our Data Protection Officer can be contacted at [dpo@kcau.ac.ke](mailto:dpo@kcau.ac.ke), by calling +254 710888022, or by writing to Data Protection Office, P.O. Box56808-00200, Nairobi, Thika Road, Ruaraka.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Data Commissioners Office (ODPC) <https://www.odpc.go.ke>

## 12. Updates to this privacy notice

We may update this privacy notice from time to time in response to changing legal, technical or business developments. When we update our privacy notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

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