



KCA UNIVERSITY FOUNDATION SCHOLARSHIP PRIVACY NOTICE

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 you provide us with is handled in accordance with the Data Protection Act 2019 and the University Data Protection Policy. This privacy notice will explain how KCA University will process your personal data.

2. The personal data we process

The personal data we collect about you include Personal details such as your name, student registration number, national ID number, physical address, telephone number, email address, date of birth, and gender; education and employment history information; visa, passport, and immigration information; academic merit/qualification information; funding and financial support information; family/guardian background information such as your parents' names, phone number, national ID number, and occupation/source of income.

We may also process the following special category of personal sensitive data: information about your race or ethnicity, sexual orientation, and religious beliefs; Information about your health, including any disability and/or medical condition.

Most of this information comes from your application direct application either via the online form, electronic forms (such as .doc or .pdf), or physical forms. We may also collect additional information from third parties, including the referees, previous schools, colleges, and universities.

3. Why we need your personal data

We are collecting your personal data in order to assess your suitability to be considered for the Scholarship. We will only collect data that we need in order to provide and oversee this service to you.

4. Legal basis for processing your data

The Data Protection Act 2019 requires us to have a legal basis for processing all personal data. In this instance, our legal bases are:

- (a) **Contract:** we process personal data with a view to entering into a contractual relationship with you. We process personal data in order to fulfil our contractual obligations to you.
- (b) **Legitimate interests:** we process personal data in ways that you would reasonably expect and which we believe have minimal privacy impact. Specifically, we process your personal data for these purposes:
 - Deal with your enquiries and contact you when you request information from us.
 - Handle any complaints you may have so that we can improve our services.
- (c) **Consent:** we offer you a real choice and control over whether you wish to participate in the under listed activities unless the requirements form part of the terms and conditions of the scholarship in which case we process your information under contract:
 - Contact you about events or activities that are held for our scholarship recipients and that we think may be of interest to you.
 - Invite you to participate in student focus groups and /or surveys.
 - Invite you to be involved in our marketing activities, which may include using your image or creating videos, vlogs or social media content.

Consequently, a consent clause will be included at the end of this privacy notice.

5. What we do with your data and who do we share it with?

All the personal data you submit is processed by staff at KCA University.

We may also share your information with third parties if those third parties form or are part of a panel that will make a decision on your application.

To help us convey the impact of supporting scholars and to thank our donors, we may share the following information with your donor: your name; course of study; academic progress reports; and photographs with your consent.

6. The right to withdraw consent

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. You can withdraw your consent by writing to dpo@kcau.ac.ke

7. How long do we keep your data?

Your personal data will only be retained for as long as it is necessary in accordance with the University's Retention and Disposal Schedule. Specifically, application forms/scholarship related information relating to unsuccessful applicants will be retained for **12 months** from the end of the application process before being securely deleted. We will retain the personal data relating to financial support and student tuition fees of successful applicants after the termination of our scholarship relationship with you for 6 years. This includes:

- Records documenting remission of tuition fees in exceptional circumstances.
- Records documenting the collection and receipt of tuition fees.
- Records documenting debt recovery of student fees (tuition, accommodation etc.)
- Invoices documenting the payment of financial aid funds and bursaries to individual students.
- Records documenting payment of prizes.

8. What are your rights?

You can request access to the information we process about you at any time. If at any point you believe that the information, we process relating to you is incorrect, you can request to see this information and may in some instances request to have it restricted, corrected, or erased. You may also have the right to object to the processing of data and the right to data portability.

If you wish to exercise any of these rights, please contact dpo@kcau.ac.ke.

Please note that the ability to exercise these rights will vary and depend on the legal basis on which the processing is being carried out.

9. Complaints

If you wish to raise a complaint about 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, 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>

10. 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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