



**UNIVERSITIES FUND**

**DATA PRIVACY STATEMENT**

**JUNE 2023**



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# TABLE OF CONTENTS

<b>1.0 INTRODUCTION .....</b>	<b>1</b>
<b>2.0 TERMS AND DEFINITIONS .....</b>	<b>1</b>
<b>3.0 CATEGORIES OF DATA SUBJECTS .....</b>	<b>3</b>
<b>4.0 PERSONAL DATA WE COLLECT FROM YOU AND PURPOSE FOR COLLECTING IT.....</b>	<b>3</b>
<b>4.1 Students Details .....</b>	<b>3</b>
<b>4.2 Institutional Details .....</b>	<b>3</b>
<b>5.0 HOW YOUR PERSONAL DATA IS COLLECTED .....</b>	<b>4</b>
<b>6.0 LAWFUL BASIS FOR PROCESSING YOUR INFORMATION .....</b>	<b>5</b>
<b>7.0 RETENTION OF INFORMATION .....</b>	<b>5</b>
<b>8.0 DISCLOSURE OF INFORMATION WITH THIRD PARTIES .....</b>	<b>6</b>
<b>9.0 MARKET SURVEYS AND RESEARCH.....</b>	<b>6</b>
<b>10.0 TERMS OF USE/ PRIVACY POLICY .....</b>	<b>6</b>
<b>11.0 USE OF COOKIES.....</b>	<b>6</b>
<b>12.0 HYPERLINKS .....</b>	<b>7</b>
<b>13.0 SAFEGUARDING AND PROTECTION OF INFORMATION .....</b>	<b>7</b>
<b>14.0 INTERNATIONAL DATA TRANSFERS.....</b>	<b>7</b>
<b>15.0 YOUR RIGHTS .....</b>	<b>8</b>
<b>16.0 HOW TO CONTACT US.....</b>	<b>8</b>
<b>17.0 AMENDMENTS TO THE CONSENT FOR COLLECTION AND PROCESSING OF PERSONAL DATA .....</b>	<b>9</b>
<b>18.0 AMENDMENTS TO THIS PRIVACY STATEMENT .....</b>	<b>9</b>

## 1.0 INTRODUCTION

Universities Fund respects your privacy and is committed to protect your personal data. This privacy statement lays down the rules and principles relating to the processing of your personal data at the Universities Fund (UF). Its purpose is to ensure that UF processes personal data in line with the Data Protection Act, 2019. It explains personal data that UF collects, the purpose of these personal data and how it processes it.

This statement should be read together with the Terms and Conditions of use for UF products and services and the consent form.

It applies to all students, suppliers, visitors and third-party entities engaging with UF under a contractual agreement.

## 2.0 TERMS AND DEFINITIONS

For the purposes of this **privacy statement**, the following definitions apply:

- **You or Your** – shall refer to:
- **Student** – Means any Kenyan citizen admitted by the Kenya Universities Fund and Colleges Placement Service (KUCCPS) to a university in Kenya and enrolled accordingly .
- **Visitor** – Any visitor that is a person who gains access to any UF premises, website, portals and mobile application.
- **Supplier** – Any supplier who has been contracted and has a signed contract by UF.
- **Third party entities** – Any entity that has been contracted or shares data with UF for the purpose of assisting UF execute its mandate.
- **UF, we, us, our, ours and its** – Shall refer to the Universities Fund .

- **Includes** – Anything that follows is not necessarily exhaustive and therefore the examples given are not the only things/situations included in the meaning or explanation of that text.
- **Personal Data** – Any data or information relating to an identified or identifiable natural person who can be identified from that data; and other information; or by means reasonably likely to be used related to that data. Personal data includes biographical data (biodata) such as name, sex, marital status, date and place of birth, country of origin, individual registration number, occupation, religion and ethnicity, biometric data such as a photograph, as well as any expression of opinion about the individual, such as assessments of the status and/or specific needs.
- **Data Subject** – An individual whose personal data is subject to processing.
- **Consent** – Any freely given and informed indication of an agreement by the data subject to the processing of his/her personal data, which may be given either by a written or oral statement or by a clear affirmative action.
- **Data Controller** – Refers to UF, an authority to oversee the management of and to determine the purposes for the processing of personal data.
- **Data Processor** – Refers to UF, including partners or third parties that processes personal data on behalf of the data controller.
- **Data protection officer** – UF's designated officer who supervises, monitors and reports on compliance with this policy.
- **Processing of personal data** – Any operation, or set of operations, automated or not, which is performed on personal data, including collection, recording, organisation, structuring,

storage, adaption or alteration, retrieval, consultation, use, transfer (whether in computerized, oral or written form), dissemination or otherwise making available, correction, or destruction.

Website – Refers to UF.co.ke.

### **3.0 CATEGORIES OF DATA SUBJECTS**

- Students;
- Suppliers;
- Third parties; and
- Visitors.

### **4.0 PERSONAL DATA WE COLLECT FROM YOU AND PURPOSE FOR COLLECTING IT**

The following is the information we collect from and store about you and the related purpose for which we collect your data:

#### **Personal Data we collect**

##### **4.1 Students Details**

##### **Personal details of Students**

**Students name**

**Gender**

**Whether physical or mentally challenged**

##### **4.2 Institutional Details**

**Level of study**

**Institutional name**

**Faculty / School**

**Admission / Registration number**

**Year of admission**

**Current year of study**

**Year of completion**

**Admission category**

**4.2.1. CourSse**

- i. When you contact us through calls, social media, our chatbot on our website and email, we may record your data following these interactions with us for quality management;
- ii. We record and retain Closed Circuit Television (CCTV) surveillance data from our CCTV devices installed at all our office locations to provide a safe and secure environment in our premises;
- iii. We record and retain your data (name, telephone number, and vehicle registration details) when you request for parking reservation at our premises, this data is used for parking allocation;
- iv. We record and retain data of visitors (names, company/ institution details, phone number, car registration details, Identification number and purpose of the visit) who visit our offices. This information is collected for the legitimate interest in securing our premises for our employees and all visitors; and
- v. We record and retain UF WIFI data (device address, traffic information on websites visited, duration and date accessed) for guest and visitors. This information is used to protect and monitor our network for information security reasons.

**5.0 HOW YOUR PERSONAL DATA IS COLLECTED**

We will collect and process data about you from the following sources:

- i. By filling in application forms when you apply for UF products;

- ii. By corresponding with us by phone, e-mail or social media platforms;
- iii. When you access our Website, data management system and submit your personal data;
- iv. When you access our Mobile application and submit your personal data;
- v. When you visit any of our premises and we collect your footages on CCTV;
- vi. From third parties who you have consented to share data with us; and
- vii. From Government Public entities.

## **6.0 LAWFUL BASIS FOR PROCESSING YOUR INFORMATION**

We will process your personal information based on any of the following lawful basis as provided for under the Data Protection Act, 2019:

- i. Consent you issue to us;
- ii. For performance of a contractual agreement with you;
- iii. Legitimate interests of the data subject;
- iv. Compliance with a mandatory legal obligation;
- v. Public interest;
- vi. To protect your vital interest; and
- vii. For the purpose of historical, statistical and scientific research.

## **7.0 RETENTION OF INFORMATION**

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, the need to comply with our internal policy and the applicable legal, regulatory, accounting or other requirements.

For the purpose of processing funding allocated to Universities Fund, we shall retain your personal data indefinitely to fulfil the purposes we collected it for, including for the purposes of satisfying our legal obligation.

## **8.0 DISCLOSURE OF INFORMATION WITH THIRD PARTIES**

- i. UF in exercising its mandate may share /disclose your personal data to third party entities below;
- ii. Resource mobilisation partners such as government bodies and private funders;
- iii. Higher Learning Institutions such as Universities Fund and Colleges; and
- iv. Information received from you through shall be processed and stored by the UF and shall be accessed by our employees responsible to carry out specific tasks in carrying out our mandate.

## **9.0 MARKET SURVEYS AND RESEARCH**

We shall send you information to create awareness of our products, our activities and accomplishments through short message services (SMS) and our social media platforms.

## **10.0 TERMS OF USE/ PRIVACY POLICY**

Kindly read these terms and conditions carefully. The following terms and conditions govern your access and use of this website which belong to the Universities Fund (UF). By accessing, using, printing, installing, or downloading any material from this site, you agree to be bound by these Terms and Conditions.

## **11.0 USE OF COOKIES**

We may store some information using cookies when you visit our website. This enables us to recognise you during subsequent visits. The type of information gathered is non-personal (such as: the Internet Protocol (IP) address of your computer, the date and time of your visit,

which pages you browsed and whether the pages have been delivered successfully.

Should you choose to do so, it is possible depending on the browser you are using, to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This will however cause certain features of the website not to be accessible.

## **12.0 HYPERLINKS**

Our websites provides hyperlinks to other locations or websites on the Internet. These hyperlinks lead to websites published or operated by other third parties. These hyperlinks have been provided for ease of navigation to enhance your user experience and are presented for information purposes only.

We do not endorse, recommend, approve or guarantee any third party products and services by providing hyperlinks to an external website or webpage. We are not in any way responsible for the content of any externally linked website or webpage.

By clicking on a hyperlink, you will leave the UF webpage and accordingly you shall be subject to the terms of use, privacy and cookie policies of the other website that you choose to visit.

## **13.0 SAFEGUARDING AND PROTECTION OF INFORMATION**

UF is committed to ensuring the security (Confidentiality, Integrity and Availability) of your information. We have put in place reasonable physical, technical, and administrative safeguards designed to prevent unauthorised access to your information.

## **14.0 INTERNATIONAL DATA TRANSFERS**

We may need to transfer your personal information outside Kenya for processing. Where we send your information outside Kenya, we will ensure that your information is properly protected in accordance with the applicable Data Protection Laws in that country that has similar legislation to Kenya.

## 15.0 YOUR RIGHTS

Subject to the exceptions on contractual and lawful bases under which UF processes your data in order to execute its mandate, below are your rights under data protection laws in relation to your personal data:

- i. Right to be informed that we are collecting personal data about you;
  - ii. Right to access personal data being processed and the purpose for processing such data;
  - iii. Right to request for correction of your personal data where it is inaccurate or incomplete;
  - iv. Right to request for deletion of your personal data noting that we may continue to retain your information if obligated by the law or entitled to do so;
  - v. Right to object and withdraw your consent to processing of your personal data noting that we may continue to process if we have a legitimate or legal reason to do so; and
- Right to request restricted processing of your personal data noting that we may be entitled or legally obligated to continue processing your data and decline your request.

## 16.0 HOW TO CONTACT US

If you would like to contact us to exercise any of the stated rights above, you can email us on [info@ufb.go.ke](mailto:info@ufb.go.ke) or submit a request via our digital platforms below.

-  [twitter.com/universities\\_fund](https://twitter.com/universities_fund)
-  [facebook.com/universities\\_fund](https://facebook.com/universities_fund)
-  [Linkedin.com/universities\\_fund](https://linkedin.com/universities_fund)

Upon contacting us:

- i. We shall verify your identity;
- ii. We shall assess the request to confirm its legitimacy; and
- iii. Formulate an adequate response to you.

As a Data Controller and Processor, below are the contact details of our Data Protection Officer:

**Data Protection Officer**  
**Universities Fund**  
**NACOSTI Building 1<sup>st</sup> Floor – Nairobi, Kenya**  
**P.O. BOX 28237-00100**  
**Website: <https://ufb.go.ke/>**

### **17.0 AMENDMENTS TO THE CONSENT FOR COLLECTION AND PROCESSING OF PERSONAL DATA**

UF reserves the right to amend or modify the provisions of the consent for the collection and processing of your personal data at any time remain and shall remain effective from the date of notification. When this happens, your express consent shall be required for subsequent loan applications.

### **18.0 AMENDMENTS TO THIS PRIVACY STATEMENT**

UF reserves the right to amend or modify this privacy statement at any time, when this happens, the current version shall be accessible from our website: <https://ufb.go.ke/>

Any amendment or modification to this privacy statement will remain effective from the date of notification on UF's website.

