

Strathmore University Data Protection Statement

Strathmore University, its schools, centres, institutes and affiliates (hereinafter referred to as “the University”) collects and utilizes personal data in the context of its activity to its students, employees, suppliers, alumni, and other stakeholders.

Any processing of personal data conducted by the University is done in compliance with Kenya’s Data Protection Act 2019 & its Regulation and the University’s Data Protection Policy. The University may provide separate or supplementary privacy notices/statements on its processing activities.

The University has put in place measures to guarantee that your data is processed securely.

The University collects personal data through the following activities (the list is not exhaustive):

1. Websites and cookies
2. Admissions
3. Financial Aid
4. Alumni
5. Donations and Sponsorships
6. Teaching and Learning (including Blended learning)
7. Recruitments
8. Job Applications
9. Executive Education Programmes
10. Research
11. Suppliers and Vendors

The University will only collect your personal data with your consent or personal data that may be necessary to fulfil its contractual commitments to you, for legal compliance, or to serve a legitimate interest in the following activities:

1. Personal data that facilitates the University’s educational offerings
2. Administering student and staff exchanges, grants and other programs, including research projects
3. Processing and responding to your requests or inquiries of any other kind
4. Providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that may be of interest to you
5. Requesting gifts and donations
6. Alerting you about a safety or security announcement
7. Conducting research, surveys and similar inquiries to help us understand trends and needs of our applicants, students and others

8. Meeting the requirements of University Regulators, and Statutory bodies
9. Performing marketing, promotions and advertising, either directly or through third-parties. These activities may include; interest-based advertising, targeted advertising and online behavioral advertising in order to increase the likelihood that the content will be of interest to you
10. Preventing, investigating, taking action regarding or providing notice of fraud, unlawful or criminal activity, other misconduct, security or technical issues, or unauthorized access to or use of Personal Data, our website or data systems or,
11. Responding to court orders, or other legal processes; enforcing University's agreements; protecting health, safety and meeting legal obligations.

The University commits to retaining your personal data for as long as it is necessary and as required under the applicable laws of Kenya. The University intends to be as honest as possible about how it utilizes your personal data, to obtain and keep the minimum amount of data and to retain it securely.

To determine the appropriate retention period for personal data, the University will consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which the University processes your personal data and whether it can achieve those purposes through other means, and the applicable legal requirements.

Your Information Rights

As a data subject, you have the following rights:

1. *Right to be informed*

You have a right to know whether, how, by whom and for which purpose personal data is being processed.

2. *Right to withdraw consent*

If the processing of personal data is based on your consent, you have the right to withdraw your consent.

3. *Right to ask for the rectification of your personal data*

If there are inaccuracies or the personal data being processed is incomplete, you have a right to request the University to rectify or complete your personal data.

4. *Right to object to the processing of your personal data*

You have the right to object (unnecessary preposition) the processing of your personal data. The University will only process such data if there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

The University can also continue to process your personal data if it is necessary for the performance of a task carried out in the public interest.

5. *Right to erasure*

You have a right to request for the erasure of your data and where this is appropriate the University will take reasonable steps to do so. The right to erasure is a limited right, and the University may not be able to agree to requests for erasure. If this occurs, the University will explain why your request is not being actioned.

6. *Right to data portability*

As a data subject, you have the right to obtain personal data concerning you in a structured, commonly used, and machine-readable format. You have the right to request the transfer of your data directly from one data processor or controller to another.

7. *Right to lodge a complaint or seek clarification*

You have a right to lodge a complaint if you think that your personal data has been processed in violation of the data protection laws of Kenya.

You can also seek clarifications on any queries you might have.

Contact detail for lodging complaints/seeking clarification is: dpoffice@strathmore.edu

