



DATA PROTECTION AND PRIVACY **POLICY**

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Policy Statement

Kagaki School is committed to safeguarding your online privacy. This policy explains how we will collect, use, disclose and dispose your information. Your personal information is in safe hands. We take your data protection with the utmost seriousness, and undertake all reasonable steps to ensure your information is secure.

Policy Objective

The main objective of this Policy is to create a compliance framework within which the handling, processing and use of personal data obtained from employees, learners, parents, guardians and other interested parties meets the globally accepted threshold of the basic principles of data protection, thereby ensuring that all information in Kagaki School's possession shall be treated with the utmost care and confidentiality.

Definitions

- I. **Consent** means any freely given, specific, informed and unambiguous indication of the data subject's wishes signifying agreement to the processing of personal data relating to them.
- II. **Data Subject** means a natural person whose personal data is held by Kagaki School.
- III. **Personal Data** means any information relating to an identified or identifiable natural person. This information includes, but is not limited to, name, age, gender, sex, marital status, health status, identification number, mobile phone number, email address, post office address, bank details and any other information considered confidential.
- IV. **Processing** means any operation performed on personal data, such as collecting, creating, recording, structuring, organizing, storing, retrieving, accessing, using, sharing, communicating, disclosing, altering, destroying or deleting personal data.

Scope of the Policy

This Policy applies to the processing of personal data in connection with the operations of the School and its application extends to all systems, people and processes that constitute the School's information systems, including learners, their guardians and parents, members of staff, suppliers and other third parties who have access to such systems and the data contained therein.

This policy sets out a framework of governance and accountability for data protection compliance within the School, ensuring that the School will apply the Data Protection Principles and other requirements of data protection law to the management of all personal data in its possession, throughout such information's life cycle by adopting the policy objectives set out herein.

Guiding Principles

Our Policy is founded upon the provisions of the Constitution of Kenya and the principles set out in the European Union - General Data Protection Regulations, and any amendments or re-enactments for the time being in force. The key principles underpinning this Policy are as follows:

Lawfulness and Fairness in processing Personal Data

Kagaki School shall collect data in a lawful and fair manner in relation to a data subject. The School undertakes to ensure that all data collected shall be for a legitimate purpose and that informed consent from the data subject shall be sought prior to processing.

Purpose Limitation

The School shall only use personal data for a specified, explicit and legitimate purpose and shall not process it in a manner that is incompatible with those purposes. Any changes to the purpose for which the data is collected, processed and used shall be premised on a legitimate ground, and shall be with the consent of the data subject.

Transparency

The School shall ensure to inform the data subject in a clear, concise and accessible way, of how his or her data is being handled, by way of this policy or by way of additional information if the data subject so requires.

Data Minimization

Kagaki School shall solely process data which is adequate, relevant and limited to the specific purpose notified to the data subject and prior to such processing, the School shall determine whether and to what extent the processing of personal data is necessary in order to achieve the purpose for which it is undertaken.

Factual Accuracy and Integrity

The School shall ensure that all processed personal data is accurate, complete and up to date. Reasonable steps shall be taken to ensure that inaccurate data is deleted, corrected, supplemented or updated without delay.

Further, Kagaki School shall safeguard the integrity of the personal data in its possession and prevent its unauthorized amendment or deletion.

Storage Limitation

Kagaki School shall ensure not to store personal data for potential future purposes unless required or permitted by national law, or with the express consent of the data subject.

Further, information shall not be kept for periods longer than it is needed and all reasonable steps will be taken to ensure that information that is no longer relevant after the expiration of legal or business process-related periods, is disposed of.

Confidentiality

The School shall ensure that all data subjects are granted the right to privacy, and that any information relating to either their family or private affairs shall not be unnecessarily revealed nor shall the right to the privacy of their communications be infringed.

The subject's data shall be treated as confidential on a personal level and secured with suitable organizational and technical measures to prevent unauthorized access, illegal

processing or distribution or disclosure, as well as accidental loss, modification or destruction.

The employees at Kagaki School are expressly forbidden from using any personal data in the custody of Kagaki School for personal or commercial gain, to call learners or their guardians for personal or commercial purposes. This prohibition extends to post employment.

Types of Information Collected.

The School collects a variety of personally identifiable or sensitive information from you for various reasons. For example, we may collect:

- I. Any **personal details** you are required give us, such as your name, age, or address. We save this so that we can keep in touch with you as an employee or a guardian or a parent of a learner at the School.
- II. Learners' **former centres of learning and prior academic performance** for purposes of shortlisting learners for interviews.
- III. Any **photographs** for purposes of promoting the school and its activities on its website, or any other medium.
- IV. Your **education and employment background**, in order to process your application if you have applied to work as an employee of Kagaki School.

Reasons for Collection of Information

Information helps to run Kagaki school more efficiently. Whenever you become an employee or a learner, we collect your personal information. This information allows us to function and become more efficient. Some examples may include:

- I. **Processing learners' and employee applications.** Your personal and sensitive information allows us to communicate with you and assess your suitability for employment positions at the school, and your child's suitability to the school.
- II. **Continuously improving.** We value any feedback, including complaints, that you may have. In order to increase impact, we make and improve the education service

we provide to you and others, we need to communicate with you and collect personal information.

- III. Being able to **communicate with you** is highly important to us, as your continued involvement in your child's learning and development is pivotal to their wholistic development.
- IV. **Emergency contacts** in case of an emergency concerning you as an employee, or a learner at Kagaki School.
- V. Remitting the requisite **statutory payments** with regards to employees.

Sources of Information

Examples may include:

- I. **From you directly**, for example, when you fill out the admission's application on our website, or the employment questionnaire.
- II. From **our website**, <https://kagakischool.sc.ke/>, once visited. We employ the use of software such as Google Analytics to identify which pages on our website are visited the most. This information is collected automatically. It does not contain any personal or sensitive information, so browsing is anonymous.

Durations of Information Retention

Kagaki School keeps personal information for different lengths of time depending on its purpose. For instance, learners and former employees may request references and recommendations. In these cases, it is important we have the correct personal information. However, you have a right to be forgotten and can therefore contact the School at any time to ask us to remove or amend your personal information.

Information Sharing

The School may need to disclose your details if required to by the police, regulatory bodies or any other relevant law.

Kagaki School never sells your personal details with third parties for the purpose of marketing. Whenever we share or transfer your personal information, we comply with the standards set by the GDPR and this policy statement at a minimum.

Information Security

The security of your information is of utmost importance to us. We seek to use reasonable measures to protect your information as required by the law, in line with industry standards and in accordance with this policy. If you reasonably believe that any personal information held by the School is no longer secure, please contact us immediately.

The Rights of the Data Subjects

- I. The right to be informed.
- II. The right of access to a copy of the information comprising their personal data.
- III. The right to rectification of inaccurate or incomplete personal data.
- IV. The right to erasure of their personal data when it is no longer needed, unless there is an overriding legal or public interest in continuing to process the data. (The right to be forgotten).
- V. The right to restrict processing of their personal data.
- VI. The right to data portability should they seek to receive personal data concerning them in a machine-readable copy or have it sent to another entity.
- VII. The right to object and prevent further processing of their data.

Implementation

The Deputy Director, in conjunction with the Information and Communications Technology Head of Department, are responsible for the implementation of this policy.

Review

This policy is subject to review every two years or sooner as the need arises.