

STUDENT PRIVACY NOTICE



Students including prospective students are advised to read this privacy notice together with the General Privacy Notice on the Botho University website.

1. Why is Personal Data collected?

The University collects and processes personal information of Students including prospective students for a wide range of purposes including:

- Processing your application;
- Enrolling you as a student and maintaining your student record;
- Administering your course and monitoring your academic progress, performance and attendance;
- Providing educational services;
- Sending you information you have requested;
- Administering the financial aspects of your studies, including tuition, accommodation and fees, as applicable;
- Providing or offering facilities and services to you during your time as a student and thereafter as part of the University's legitimate business; services such as computer access, library access, sports facilities, university accommodation, membership with Alumni Association and other activities;
- Recording the details of your studies and confirming your academic achievements including communication to prospective employers;
- To monitor and support your research activity;
- To deliver facilities and services to you e.g. IT facilities;
- To communicate with you by email, post and telephone and through any learning management system such as Blackboard;
- To enable your participation at various University events such as Graduation ceremony;
- Submitting reports and statistics as required by relevant educational and professional bodies including the regulatory bodies and Government student funding agencies;
- Monitoring data for equal opportunities and gender equality;
- Prevention and detection of crime such as using CCTV or attaching photos to ID cards;
- To enable us to contact others in the event of an emergency;
- Fundraising and marketing activities;

- Research archiving and statistical purposes;
- Processing student academic appeals, student discipline cases, and student complaints;
- Providing student support services, such as counselling or career advice; and
- Operating disciplinary, complaint and quality assurance processes and regulations.

The above list is not an exhaustive list and there may be other purposes not listed which are compatible with the original purpose for which your data is collated.

The University may necessarily process your Personal Data for these purposes primarily for the performance of our contractual obligations to you, for compliance with a legal obligation, for the performance of tasks carried out in the public interest, and for the pursuit of the legitimate interests of the University. The University may also find it necessary to process your Personal Data for protecting your vital interests.

Your consent for any specific use of your Personal Data (including Sensitive Personal Data such as health or disability data) will be obtained at the time of collection, and you can withdraw this consent at any time. When consent is withdrawn the University will not be able to process your data any further.

2. What Personal Data Is Collected

- a. The University may collect Personal Data as part of the processes of student enquiries with the University, application to University programmes, student enrolment, student registration, student academic studies, graduation and beyond.
- b. The University may collect Personal Data such as name, address, date of birth, programme studied, fee payments, information about examinations, assessments and results. The University may also collect and process some Sensitive Personal Data, including information about your health and disabilities (to provide support and access to University services), gender and information about criminal convictions and offences.
- c. When you join us you will be given a University email address. Logging of the use of this email and other ICT based systems routinely takes place to ensure the proper functioning of those systems.
- d. Visual Images

When you join us as a student you will be required to provide a photograph to be used on your campus card. This photograph may also be:

- i. Published on a departmental website;
- ii. Attached to hard copy records that are stored securely and available to a select number of staff that require access;

- iii. Used on departmental lists or pictureboards that may be displayed in public buildings or the University; or
- iv. Attached to an electronic student record that can only be viewed by University staff.

From time to time we may commission photography or live imaging on campus or at specific events, such as graduation ceremonies. Processing photographs or video images obtained at events is based on legitimate interest for recruitment, advertising or information purposes. These pictures or videos may be used to livestream or post on the University's social media platforms. Whenever the University takes steps to photo or film around the University we will attempt to display notification that filming and photography is taking place. It must be recognized that at large events it may be impractical to seek individual consent from all individuals present. Those attending the event have the option to avoid being photographed or filmed by moving away from the camera. If the photo or filming is of individuals or small groups we will do our best to request consent from those whose images are the focus of the photo or film.

Learner Analytics, Attendance and Engagement

The University provides various initiatives to support students to improve their attendance and to engage better with their studies. The University monitors student attendance at taught sessions and log in activity on the Virtual Learning Environment (e.g. Blackboard). This data is collectively known as Learner Analytics. This information will be used to monitor your level of engagement and to provide support where necessary to improve your performance. If considered necessary, the University may also use your Learner Analytics to investigate student academic appeals, student discipline cases, or relevant complaints.

3. How Personal Data is Collected

- a. Personal Data is collected when you apply to the University through the applications process, whether or not you apply through a third party or directly. It is usually collected electronically, but hard copy records may also be collected.
- b. Personal Data is obtained electronically at the point of enrolment and thereafter both electronically and through paper records throughout the course of your studies as part of your student record and your academic progress.
- c. Personal Data may be obtained from third parties contracted to provide certain services to the University.
- d. Personal Data may also be obtained through your use of University services for example, the library.

Lawful basis

The University processes your Personal Data under the following lawful bases:

- **Contract** – this arises from the contractual relationship you have with the University.

- Legitimate Interest – the University is an educational institution and also a commercial entity and processing is necessary for the purpose of its legitimate interests related to the services the University provides.
- Compliance with a legal obligation – where the University has to provide information as required by law.
- Vital Interests – processing of your Personal data is necessary to facilitate your vital interests .

NB: We will only rely on your consent to process your Personal Data where this is expressed and informed. You may withdraw your consent at any time.

4. How will my Personal Data be Shared?

The University will share your Personal Data internally between faculties, departments and University managed facilities e.g. the student library or student accommodation, in fulfilment of the purposes described above.

The University may pass your Personal Data to third parties in the following circumstances:

- i. To suppliers (such as IT service providers) who process information on our behalf;
- ii. To independent suppliers who are under a contractual obligation to assist us with our business operations;
- iii. To law enforcement or regulatory or professional bodies;
- iv. If required by our internal and external auditors.

The University may also share information as follows:

- Funding bodies/government departments: Relevant Personal Data including periods of attendance, assessment results and similar Personal Data will be shared with formal funding bodies including the Department of Tertiary Education Funding DTEF, as this may affect your right to receive funding. The University is obliged to share your Personal Data with funding bodies and certain Government agencies as appropriate, including failure to attend or interruption to study.
- Government agencies: Data protection laws allow the University to disclose your Personal Data to relevant bodies without your consent relating to the prevention/detection of crime, the apprehension and prosecution of offenders, the protection of an individual's vital interests/welfare or safeguarding national security.
- Sponsors: If your tuition fees are paid under a sponsorship, scholarship or loan arrangement by an external organisation (e.g. your employer), the University may share Personal Data relating to your attendance and academic progress. Where your funding organisation requests progress reports, the University will normally comply.

- **Professional bodies:** The University is obliged to share your Personal Data with professional bodies to confirm your qualifications, accreditation of your course and other requirements such as your professional registration.
- **Education institutions and placement providers:** If you are involved in study arrangements with other organisations, e.g. exchanges or placements, or with any of the University's partner institutions, the University may disclose some of your Personal Data to the relevant provider including those outside of Botswana for the purpose of arranging and administering a placement and generally as necessary in relation to your studies. This may include details of your admissions status, academic progress, attendance, and attainment. The University will obtain your express consent to share Sensitive data, and you can withdraw your consent at any time.
- **Third Parties for internships/apprenticeship/dual learning/employment:** The University will share your Personal data with third parties such as employers or other agencies in connection with your internship (including Virtual Internship), apprenticeship, Dual Learning/Work Integrated Learning or employment. We will also share with your employer any information which may impact the progression and successful or timely attainment of your internship (including Virtual Internship), apprenticeship or Dual Learning/Work Integrated Learning. This may include any application from you to the University for mitigating/extenuating circumstances, academic appeals, complaints or interruptions to your study and any process invoked by the University in respect of your study, such as the disciplinary process. Any disclosure to your employer will be limited to what is necessary and typically this will be limited to the outcome, not the detail of any particular process. You will be informed expressly where it is considered necessary to share more than this. The University may disclose some of your Personal Data to the relevant provider outside of Botswana for the purpose of arranging and administering a placement or virtual internship.

Turnitin®

The University uses the Turnitin® system as a plagiarism detection source. The Turnitin® system compares the student's work against a variety of sources. You will be required to provide basic Personal Data (e.g. name, e-mail address, course details) to use the Turnitin® service. Turnitin is an entity unrelated to the University and you are to refer to Turnitin's Privacy Statement which provides further information regarding the collection and processing of your Personal Data when using this service.

Debt recovery/credit control

Your Personal Data may be shared with third parties attempting to recover debt on behalf of the University where internal debt recovery procedures have been unsuccessful. The University may also include details of an outstanding debt in any reference or verification of results supplied to a third party as per the University's Regulations.

Insurance

The University may share your Personal Data with its insurers for the purpose of providing insurance cover or in the event of a claim.

Parents, guardians and other relatives

The University will not disclose your Personal Data to parents or relatives without your consent, other than in exceptional circumstances where the University is required to do so in your vital interests or where you are still a minor.

Graduation: Graduate names, programmes and classifications are published within the University, printed in the graduation brochure and may be published on our website. Graduation ceremonies are regarded as public events and may be recorded and/or live streamed by the University.

Regulatory Agencies

The University will provide Personal Data about our students to the various regulatory agencies such as Botswana Qualifications Authority (BQA) to fulfil our duties as an Approved Education Provider.

Student support services and Special needs

The University has various student support functions such the Student and Alumni Department (SAAD) which provide special needs and student retention support to students. If you engage with the services of these functions any Personal Data supplied by you, including Sensitive personal data, may need to be shared with relevant staff and/or panels based in various faculties or departments or with certain Collaborative Partners in order to assist in the consideration of your case. You will be asked to provide your consent to process Sensitive Personal Data when submitting certain application forms which can be withdrawn at any time. If you supply third party data this will normally only be accepted with consent of the third party, and this may also need to be shared as stated above.

Enrolment and Marketing

The University may engage external marketing agencies to act on our behalf to manage enquiries, nurture and track from early enquiry stage to enrolment, contacting students directly and supporting them through to enrolment. The external marketing agencies will also assist us with marketing our courses, services and events. We will contract with the appointed marketing agencies to act as data processors on our behalf. They only perform activities explicitly agreed by us and they will process your data in order to respond to your enquiry, communicate content specifically regarding the University that you have agreed to receive and act as a proactive enquiry service as you progress through your application to study with us.

Agents

The University partners with various international agents who represent students during the application process. If you apply through, or with the assistance of, an international agent then we may need to share information with them to administer your application, visa details and payments for the agent's work.

Records:

The University will need to maintain some records relating to you after you graduate. This will allow us to verify your award, provide transcripts of your marks, opportunities for further study, academic references, careers support, alumni and networking services. Some of these records will need to be retained

indefinitely so that we may confirm to future employers that you were a student here. Please contact the Data Protection officer should you have any queries relating to this.

Surveys

The University may carry out various surveys, studies such as the Graduate Tracer Study and will contact you to request that you complete the survey. Data gathered for the survey will, to the best of our ability, be anonymized.

Alumni

If you have consented to be a member of the University Alumni Association, you may be given an opportunity to update your details from time to time.

Award verification

The University may disclose to third parties whether or not you have received an award and if so, the date and classification, without notifying you. Such a disclosure would be subject to checks regarding the nature and purpose of the request, and will only be disclosed where the University is satisfied a request is for legitimate purposes.

References

Academic staff may agree to provide a reference for you if you apply for a job or further study. You should ask permission from the staff member before providing their Personal Data to a third party. References will only be given in response to a written request from you and will be in accordance with the University's format for references.

5. How long is my personal data kept for?

We will only retain the Personal Data we hold about you as long as necessary and in accordance with the Retention Schedule for various information.

6. Transfers of Personal Data outside of Botswana

Most commonly we will share your Personal data outside Botswana if you are an international applicant and we are liaising with you or your agent in relation to your application. We may also pass Personal Data to other organisations within or outside Botswana who are contracted to provide services to us where the transfer is necessary for the provision of those services. Some of these countries may not have the same level of data protection as Botswana. If we make such a transfer we will ensure this is subject to appropriate safeguards.

7. Your rights and responsibilities

Please refer to the University's General Privacy Notice for information on your rights and responsibilities and how to complain.