

GENERAL UNIVERSITY PRIVACY NOTICE



## General University Privacy Notice

### 1. Purpose

Botho University is a "Data Controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

This Privacy Notice applies to all individuals that access the services of, or provide services to the University, including those that are involved with its core functions and are considered core relationships. These may also include current and prospective students, alumni, employees, contractors both on and off campus, guests, and visitors, including external speakers and external examiners.

We may amend this notice to reflect changes to our services, data protection law or other legislation. We may also in future publish privacy notices for specific categories of data subjects including students and staff. For this reason, we ask that you revisit this notice on a regular basis.

### 2. What personal data do we collect and why?

Personal data collected for many interactions with the University on a day to day basis will be limited to basic personal data such as name and contact details. However, depending on our relationship with you, we may be required to process any of the following personal data:

- a. Name, title, gender, nationality, date of birth and name changes; contact details including email, postal address, telephone number, mobile number and links to social media accounts;
- b. Occupation and professional details, including relevant qualifications and experience;
- c. 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.
- d. 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), your gender and information about criminal convictions and offences.
- e. Information on the engagement you have had with the University's services and facilities such as the library;
- f. Information required to facilitate events that you may attend such as dietary requirements and/or areas of interest;
- g. Financial information to facilitate payments from or to you.

### 3. What are the lawful bases for processing my personal data?

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

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

c. Compliance with a legal obligation – where the University has to provide information as required by law.

d. 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. Who will my personal data be shared with?

Your personal data will be shared internally for the purposes of managing our relationship with you and/or delivering the services and facilities with which you engage.

In certain circumstances your personal data may be shared with external parties for example:

- a. With independent suppliers who are under a contractual obligation to assist us with our business operations
- b. With law enforcement or regulatory or professional bodies; If required by our auditors.

#### 5. Marketing

The University may contact you about upcoming activities, services and facilities that we think may be of interest to you unless you have indicated you do not wish to receive communications from us.

We may use your information to communicate with you via post, email, telephone, text (SMS), social media or other methods as appropriate. You can opt out of receiving communications by contacting the Data Protection Officer on [dpo@bothouniversity.ac.bw](mailto:dpo@bothouniversity.ac.bw).

#### 6. How long is my personal data kept for?

We will only retain your Personal Data as long as necessary and in accordance with the University's Retention Schedule. This will depend upon your relationship with the University.

#### 7. Your Rights

As a data subject you have certain rights. These include:

- a. The Right to be informed what personal data is processed about you and to obtain a copy. You can request a copy of your personal data at any time by writing to us by email at [dpo@bothouniversity.ac.bw](mailto:dpo@bothouniversity.ac.bw). While we hope to provide this service free of cost, in cases where data extraction is complex, depending on the nature of the data there may be a charge associated with this service.
- b. The Right to lodge a complaint with the office of the Commissioner.
- c. If you think there has been a breach of Data Protection legislation you have the right to lodge a complaint with the University and the office of the Commissioner.
- d. Right to Erasure: You have the right to have some Personal Data we hold about you erased without undue delay. This is not an unqualified right, and the University will not always be able to action a request e.g. where the personal data is still required for the original purpose and another lawful basis for processing applies. It is possible that by erasing your records it becomes problematic for us to render the service required of us.
- e. Right to Object: You have the right to object at any time to the processing of your Personal Data. The University will consider your request, however, it may not always be possible to facilitate such a request where there are compelling legitimate grounds to process Personal Data or processing is necessary for the establishment, exercise or defence of legal claims.
- f. Right to withdraw Consent: Where consent forms are the basis for processing, you have the right to withdraw your consent to the processing at any time subject to the same qualifications referred to above.

- g.** Right to Data Portability: If you request us to, we can transmit your Personal Data directly to another organisation.
- h.** Right to Rectification: You have the right to ask us to rectify inaccurate information held about you without undue delay.
- i.** Right to Restriction: You have the right to restrict processing where accuracy of the data is contested.

## **8. Contact Details**

The Data Controller is Botho University, Gaborone, Botswana. For any queries relating to the processing of your data by the University or to exercise any of your rights please contact the University's Data Protection Officer [DPO@bothouniversity.ac.bw](mailto:DPO@bothouniversity.ac.bw)

## **9. Changes to this notice**

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

## **10. How do I complain?**

In the first instance you should contact the University's Data Protection Officer (see above). If you are not happy with the way your information is being handled, or with the response received from us in response to a complaint, you have the right to refer the matter to the office of the Commissioner.