

## Privacy Policy

### Introduction

We are dedicated to safeguarding the privacy and security of your personal information. This privacy policy outlines how we collect, use, and share information about you when you visit our website, use our services, or engage with us in other ways.

### Definitions

For the purposes of this privacy policy, the following definitions apply:

- **Personal Information:** Information that can be used to identify an individual, such as name, contact details, identification numbers, and other related information.
- **Educational Information:** Details pertaining to an individual's academic history, qualifications, and other education-related data.
- **Technical Information:** Data related to the technology used to access our services, including IP address, browser type, and operating system.
- **Usage Information:** Information about how our services is accessed and used, including pages visited and actions taken.
- **Service Providers:** Third-party companies that provide services on our behalf, such as IT support, data storage, and communication services.
- **Cookies:** Small files stored on a user's device that hold data related to their website visit.

### Information We Collect

We collect personal information directly from you through forms, online applications, email, and other interactions with the ALC. We also collect technical information automatically when you access our website using cookies and similar technologies. We collect several types of information in connection with the services we provide, including:

- **Personal Information:** This includes your name, contact information (email address, phone number, postal address), identification numbers, and any other information you provide to us.
- **Educational Information:** Information related to your academic history, qualifications, and other educational details relevant to your application or enrolment at ALC.
- **Technical Information:** This includes your IP address, browser type, operating system, and other technical details when you visit our website.

- **Usage Information:** Information about how you use our website and services, including the pages you visit and the actions you take.

## How We Use Your Information

We use the information we collect for various purposes, including:

- **Providing and Improving Services:** To process your applications, manage your enrolment, and enhance our educational offerings.
- **Communication:** To communicate with you regarding your application, enrolment, events, and updates from ALC.
- **Compliance and Legal Obligations:** To comply with legal requirements and regulations.
- **Security:** To protect our website, services, and users from fraud and other malicious activities.
- **Analytics:** To analyse usage trends and improve our website and services.

## Sharing Your Information

We may share your information with:

- **Service Providers:** Third-party service providers who assist us in delivering our services, such as IT support, data storage, and communication services.
- **Education Providers:** Third-party education providers who assist us with delivering and providing courses.
- **Legal and Regulatory Authorities:** When required by law or in response to legal requests.
- **Affiliated Organisations:** Other educational institutions or bodies for academic verification and collaboration purposes.
- **Other Partners:** When they share the information with the ALC.

If you disclose any personal data relating to other people to the ALC or to our third-party service providers in connection with the Services, you represent that you have the authority to do so, and that you undertake to indemnify and keep us indemnified against all liability arising out of the disclosure or use of such information including all actions, suits, proceedings, claims, costs, and expenses that may be taken against us as a consequence of such information having been in our possession and use.

## Use of Personal Data

The ALC will use or share with third parties' personal data as prescribed in the Act for legitimate business purposes including:

- **Providing the functionality of the Services and fulfilling your requests:** To provide the Services' functionality to you, such as providing access to your student portal account and providing you with related services or communications. If you do not provide the information requested, we may not be able to provide the Services' functionality.
- **Responding to your inquiries and fulfilling your requests:** When you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments, or complaints, or when you request other information.
- **Completing your transactions:** To provide you with related services or communications.
- **Sending administrative information to you:** Such as changes to our offerings, terms, conditions, and policies.
- **Allowing you to send messages to another person:** If you choose to do so.

The ALC will engage in these activities to manage our relationship with you and/or to comply with any legal obligation.

- **Providing you with our newsletters and/or other promotional materials and facilitating social sharing:** Sending you promotional-related emails, with information about our services, offerings, new initiatives, and other news about the ALC. Facilitating social sharing functionality that you choose to use.

The ALC will engage in the under-noted activities with your consent or where we have a legitimate interest:

- **Analysis of Personal Information for reporting and providing personalized services:** To analyse or predict its users' preferences to prepare aggregated trend reports on how our digital content is used, so it can improve services. To better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests. To better understand your preferences so that we can deliver content that it believes will be relevant and interesting to you.
- **Aggregating and/or anonymizing Personal Data:** The ALC may aggregate and/or anonymize personal data so that it will no longer be considered personal data. It does so to generate other data for its use, which it may use and disclose for any purpose.

Subject to your consent or in instances where it is permitted by written law, the ALC may use your personal data for its business and operational purposes as stated below:

- **For data analysis:** For example, to improve the efficiency of services provided.

- **For audits:** To verify that internal processes function as intended and are compliant with legal, regulatory, or contractual requirements.
- **For fraud and security monitoring purposes:** For example, to detect and prevent cyber-attacks or attempts to commit identity theft.
- **For developing new offerings, initiatives, and services.**
- **For enhancing, improving, or modifying current offerings, initiatives, and services.**
- **For identifying usage trends:** For example, understanding which parts of our service and courses are of most interest to users.
- **For determining the effectiveness of promotional and informational campaigns:** So that we can adapt our campaigns to the needs and interests of our users.

### **Disclosure of Personal Information**

We may disclose Personal Information to third parties to facilitate the services they provide to the ALC which are necessary for the performance of the contract between the ALC and the students. These can include providers of services such as educational courses, data analysis, payment processing, event registration, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services.

By using the ALC Services, you may elect to disclose personal data through your social media account. You will share information with your friends associated with your social media account, with other users, and with your social media account provider. By doing so, you authorize the ALC to facilitate this sharing of information, and you understand that the use of shared information will be governed by the social media provider's privacy policy. Please note that any information you post or disclose through these services will become public and may be available to other users and the public.

### **Other Uses and Disclosures**

The ALC may use and disclose your personal data when it has a legal obligation or legitimate interest to do so. This may include:

- To comply with applicable law and regulations within its jurisdiction or comply with a contractual obligation to which the students are parties. Disclosure of data outside the country is subject to Section 25 (f) of the Data Protection Act. Either consent from the data subject should be availed or there should be proof of adequate data protection safeguards.
- To cooperate with the government and its agencies.

- To cooperate with any other law enforcement agency within its jurisdiction.
- For compliance with any legal obligation to which the ALC is a party.

### **Other Information**

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. This includes:

- Browser and device information.
- System usage data.
- Information collected through cookies and other technologies.
- Demographic information and other information provided by you that does not reveal your specific identity.
- Information that has been aggregated in a manner such that it no longer reveals your specific identity.

If the ALC is required to treat Other Information as Personal Information under applicable law, then it may use and disclose the information for the purposes for which it uses and discloses Personal Information as detailed in this Policy.

### **Collection of Other Information**

The ALC may collect other information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device. The ALC may use this information to ensure that the Services function properly.
- **Through your use of the Systems:** When you use the Systems, The ALC may track and collect system usage data.
- **Using cookies:** Cookies are pieces of information stored directly on the computer that you are using. Cookies allow the collection of information such as browser type, time spent on the Services, pages visited, language preferences, and other traffic data. The ALC may use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience.
- **Using technology to track the use of services and improve the services:** We may use Google Analytics, which uses cookies and similar technologies to collect and analyse information about the use of services and report on activities and trends. We may also collect information regarding the use of other websites, apps, and online resources.

- **IP Address:** An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications, and other services. IP addresses are used for purposes such as calculating usage levels, diagnosing server problems, and administering services. Your approximate location may also be derived from your IP address.

### **Uses and Disclosures of Other Information**

The ALC may use and disclose Other Information for specific purposes, pursuant to the Data Protection Act, 2019, except where required to do otherwise under applicable law.

### **Security**

The ALC seeks to use reasonable organizational, technical, and administrative measures to protect personal data within the ALC. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with the ALC is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

### **Your Choices Regarding the ALC’s Use and Disclosure of Your Personal Data**

The ALC will seek your consent regarding our use and disclosure of your personal data for promotional purposes in accordance with our Data Privacy policy. You may opt-out of receiving electronic communications from us. If you no longer want to receive promotional-related emails on a going-forward basis, you may opt-out according to instructions in such communications. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails, we may still send you important administrative messages, from which you cannot opt out.

### **Access to Change or Deletion of Your Personal Data**

To the extent these rights are provided to you by applicable law, if you would like to request to review, correct, update, suppress, restrict, or delete personal data that you have previously provided to the ALC, object to the processing of personal data, or if you would like to request to receive an electronic copy of your personal data for purposes of transmitting it to another entity, please contact the ALC [info@africanleadershipcentre.org](mailto:info@africanleadershipcentre.org) or [Central.hub\\_abc@africanleadershipcentre.org](mailto:Central.hub_abc@africanleadershipcentre.org). We will respond to your request consistent with applicable law.

### **Retention Period**

The ALC will retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with the ALC or keep using the Services).
- Whether there is a legal obligation to which the ALC is subject (for example, certain laws require the ALC to keep records of your transactions for a certain period before we can delete them).
- Whether retention is advisable in light of our legal position (such as regarding applicable statutes of limitations, litigation, or regulatory investigations).

### **Jurisdiction and Cross-Border Transfer**

Your personal data will be stored and processed in Kenya. It will only be transferred outside Kenya under the provision of Section 25 (f) of the Data Protection Act is complied with, i.e. there is proof of adequate data protection safeguards and that the country whose data is to be transferred to has data protection laws equal to the Data Protection Act 2019 and by consenting to this agreement. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your personal data subject to compliance with the provisions of treaties and conventions ratified by Kenya on Data Protection as well as the Data Protection Act, 2019.

### **Third-Party Payment Services**

The ALC may use a third-party payment service to process payments made through the Services. If you wish to make a payment through the ALC Services, your personal data will be collected by such a third party and not by the ALC and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over and are not responsible for this third party's collection, use, and disclosure of your Personal Information.