

# ALU

## PRIVACY POLICY

ALU is committed to higher education and to raising ethical and entrepreneurial leaders for the African continent and beyond.

As part of our operations, we may need to process certain of your personal data. We care about your personal data, so we ask that you take time to read our present Privacy Policy ("policy") as it sets out important information relating to how we handle your personal information.

By accepting the terms of this Privacy Policy, you accept and consent to the Processing of your Personal Data as per the terms of this Policy.

We are thrilled to have you in the ALU team! Let's DO HARD THINGS together!

### (A) This Policy

#### **Summary**

##### Applicability:

This Policy explains how we Process Personal Data. This Policy is issued by each of the Controller entities listed in Section (R) below (together, "ALU", "we", "us" and "our") and is applicable to the Personal Data of individuals within our organisation with whom we interact, including (without limitation) our employees, our consultants and other members of our workforce (together, "you").

We value the Personal Data of our stakeholders and as part of the ALU Team, you are also required to adhere to applicable data protection laws and regulations in force, this Policy and any other related ALU policies and guidelines.

##### Definitions:

Capitalised terms in this Policy are defined in Section (S) below.

##### Updates:

Updates may be made to this Policy from time to time, in line with changes to the way that we Process Personal Data and/or in accordance with legal requirements. Therefore, you are strongly encouraged to read this Policy carefully and check it regularly for any updates.

### (B) Collection of Personal Data

#### **Summary**

##### Sources of collection:

We collect or obtain Personal Data in different ways but mainly as follows:

- ❖ when you apply for a job or internship with us, as part of the recruitment process;
- ❖ from recruitment agencies;
- ❖ from due diligence and background check service providers;
- ❖ when we are completing formalities to be able to enter into a transaction with one another e.g. you have received a conditional offer to be employed, subject to completing some formalities;
- ❖ We also collect or obtain Personal Data about you from third parties who provide it to us e.g., credit reference agencies; law enforcement authorities, job or supplier referees etc.

- ❖ We may also lawfully collect and compile information from your different public sources such as social media profile(s), in order to better understand how you are evolving during and after your journey with us as more fully detailed in this Policy.
- ❖ when you enter our premises and follow our security and identification measures;

We may collect Personal Data directly or through a third party, through automated means, manually or otherwise.

#### Children's Personal Data:

We may need to process the Personal Data of your dependents such as children for insurance purposes or as part of the events organised for ALU's workforce and their family members.

Any person below the age of 16 years shall be considered as a child for the purposes of the Processing of his or her Personal Data and must be represented by his or her legal guardian.

Furthermore, in the countries where ALU operates, it may be that the legal age is 18 years, which means that only persons aged 18 years and above are lawfully able to contract. If this is the case, such persons must be represented by or have the authorisation of their legal guardian(s) for the purposes of any dealings with us.

If you provide Personal Data to us, on behalf of a third party, you must ensure that it is lawful for you to disclose such data to us, and you must ensure that a valid legal basis applies to the Processing of that Data.

### **(C) Enhanced or additional Personal Data**

#### **Summary**

Through your interactions with us, we may also lawfully enhance or add to your Personal Data records with us e.g. through Profiling and analytics, credit scoring, compilations of Personal Data from different sources, results following your performance appraisals, psychometric tests etc. However, please note that at ALU, we **do not** take decisions with respect to you, **based solely on automated Processing**. Should we ever result to such Processing, we will seek your consent to do so, where required under law.

### **(D) Categories of Personal Data that we Process**

#### **Summary**

We Process different categories of Personal Data about you for different lawful reasons, namely (without limitation) as follows:

- **Personal details:** given name(s), preferred name, date of birth, passport/ID no, identity details, photograph, signature (whether in ink and/or electronic form) gender, age, nationality and entitlement to work in ALU's jurisdiction, title; marital status and language preferences to enable us to check and verify your identity, driver's licence.
- **Contact details:** correspondence and/or business address, shipping address, telephone number, email address, job title, online messaging details and social media details.
- **Professional details:** details of your previous education, work experience and accomplishments such as academic grades, previous employment, memberships and affiliations with professional bodies or otherwise, alumni professional experience, status and rewards, academic and professional details from job candidates, and any other recruitment details found in your Curriculum Vitae and/or documents submitted in support of your job application or employment or consultancy with ALU.
- **Family / next of kin details:** family status, dependents, next of kin's details.
- **Financial data:** any payment details and/or information to prevent any financial crimes, to effect payments of salaries and/or consultancy fees, insurance, pension and other benefits, any invoice records, payment or payroll records, date and amount of payment, bank account number, address, tax status, payment method, cardholder or account holder name, SWIFT details, IBAN details, vehicle horsepower etc.

- **Transaction data:** any details on the job description, services and/or products being procured or provided and/or any contractual arrangements, such as contracts of employment, working hours and timesheets, attendance, leave entitlements, details of secondary employment, performance appraisals.
- **Health and Wellness records:** physical and/or mental health history and/or status, allergies e.g. for insurance purposes, visa purposes, health and safety, for campus life support services, for compliance with statutory and regulatory sanitary requirements.
- **Third Party sourced data:** Information from third party sources such as for screening, credit scoring and reference checks, as well as your publicly available profile information on social media sites.
- **Technical Data e.g. relating to our Sites and Apps:** device type, operating system, browser type, browser settings, IP address, time zone, dates and times of connecting to a Site, App usage statistics, App settings, dates and times of connecting to an App, location data, and other technical communications information (some of which may constitute Personal Data, some of which will not), username, login details, usage data, aggregate statistical information.
- **Profile Data:** Your interests, preferences, personality traits, psychometric assessments, credit scoring, where applicable, results from surveys.
- **Location data:** such as your geo-location, location or device localisation captured through a system or network e.g. through swipe card access or on the Controller's devices or vehicles or CCTV.
- **Views and opinions:** any views and opinions that you choose to send to us (e.g. through surveys), or publicly available posts about us on social media platforms.
- **Other (where applicable):** health and safety incident reports, disciplinary details and supporting documents, your visual and vocal recordings/photographs.

ALU is mainly funded through the generosity of its key partners, stakeholders and donors. In order to ensure a sustainable and trust-worthy relationship with our key stakeholders and demonstrate the impact of their investment, we may also collect, use and share with them, aggregated Demographic Data but your identity is usually not visible to them, unless you have consented or contracted to specific reporting obligations or we have a legitimate interest to communicate the same. Should we need to disclose your identity and details to those key stakeholders, due to our reporting obligations, we will ensure that the same is done lawfully.

### **(E) Sensitive Personal Data (also known as "Special Category of Personal Data")**

#### **Summary**

We do not seek to collect or otherwise Process Sensitive Personal Data or Special Categories of Personal Data unless it is essentially necessary and lawful for us to do so, for example, we may collect and Process:

- Physical and/or mental health history and/or status, allergies e.g. for insurance purposes, visa purposes, for campus life support services, for compliance with statutory and regulatory sanitary and health and safety requirements;
- Details of any pending criminal prosecutions or actual criminal convictions as part of the screening exercise before we decide to interact with you;
- Biometric data, namely for security purposes;
- details of your affiliation with a trade union.

Sensitive Personal Data or Special Categories of Personal Data may be lawfully Processed, mainly for the following reasons:

- **Compliance with applicable law:** We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law e.g. to comply with our diversity obligations, to ensure that public health protocols are adhered to;
- **Detection and prevention of crime:** We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime e.g. the prevention of fraud;
- **Establishment, exercise or defence of legal rights:** We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal rights; or
- **Consent:** We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your express consent prior to Processing your Sensitive Personal Data (this legal basis is only used

in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

## **(F) Purposes of Processing and legal grounds for Processing**

### **Summary**

We Process Personal Data for various lawful purposes. The main lawful grounds for Processing Personal Data are as follows:

- **Consent** – your consent which is explicitly and freely given, unless another lawful ground applies.
- **Pre-contractual or contractual obligation** – Processing of Personal Data is required for the purposes of entering into or performing a contract with us, namely your work agreement with us.
- **Legal obligation** – the law specifies the requirement to Process such Personal Data.
- **Vital interest** – Processing of Personal Data is needed in order to protect and save life.
- **Legitimate Interest** – there is a compelling and legitimate need to Process the Personal Data, which outweighs any prejudice that could be caused to you from such Processing and measures are taken to reasonably mitigate risks of Processing.
- **Public Interest** – Processing is necessary in order to meet a duty of public interest.
- **Historical, statistical and/or scientific research.**

We may also Process Personal Data for the establishment, exercise or defence of legal claims or proceedings.

### **Processing activity**

**For managing and executing our operations:** managing our transactions and contractual obligations or taking steps to enter into such transactions with you, whether online or offline, namely for your working agreement with us or any other related contractual arrangement. This may also include conducting screening, due diligence, reference and background checks prior to transacting. Some examples are: when we are completing formalities to be able to enter into a transaction with one another and you have received a conditional offer of employment; entering in an employment or job consultancy agreement with you; monitoring and managing your job performance; considering you for another job position or promotion within ALU; reviewing salary and benefits; reviewing job description etc. The provision of services is often dependent on the ability to Process such Personal Data.

### **Legal basis for Processing**

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us. ; or We have a **legitimate interest** in carrying out the Processing for the purpose of providing our services or administering our Sites (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

**KYC and Due Diligence exercises:** conducting screening, identity and due diligence checks prior to entering into a transaction with you or where the same is required under law. This could also include statutory requirements, such as for AML/CFT legislations.

**Financial management:** sales; finance; payroll; corporate audit; and vendor management.

**Legal compliance:** compliance with our legal and regulatory obligations under applicable law. This may include complying with AML/CFT legislation, (to combat the risk of financial crimes), tax laws, health and safety laws and Company law.

**Investigations:** detecting, investigating and/or preventing breaches of policy or contraventions of the law, e.g. criminal offences and/or financial crimes and/or any abuses of and/or infringement on our rights, products and/or services. This could also include use of our CCTV recordings.

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

We have a **legitimate interest** in carrying out the Processing (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way); or

The Processing is necessary for **compliance with a legal obligation**.

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

The Processing is necessary for **compliance with a legal obligation**; or

We have a **legitimate interest** in carrying out the Processing for the purpose of providing our services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way).

The Processing is necessary for **compliance with a legal obligation**; or

We have a **legitimate interest** in carrying out the Processing (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

We have a **legitimate interest** in carrying out the Processing (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way); or

The Processing is necessary for **compliance with a legal obligation**; or

**Security, Health and safety:** health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations. This may include use of CCTV on our premises, security and access controls, records of visits to our premises, login records and access details, swipe card or pin code access, biometric access.

**Legal proceedings:** establishing, exercising and defending legal rights.

**For displaying content from our ambassadors:** You may agree with ALU to represent ALU and showcase your ALU experience or share your personal life stories and/or you make a public post about us on social media and tag ALU, so that the latter may repost your content on its public platforms.

The Processing is required for the **establishment, exercise or defence of legal claims or proceedings.**

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or We have a **legitimate interest** in carrying out the Processing (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way); or

The Processing is necessary for **compliance with a legal obligation.**

The Processing is necessary for **compliance with a legal obligation;** or

We have a **legitimate interest** in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

We have a **legitimate interest** in carrying out the Processing for the purpose of providing our services or administering our Sites (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way).

By accepting this Policy, whenever you tag ALU in any posts about or related to ALU on social media platforms, you agree that the same can be reposted by us on our online public platforms.

**Photographs and recordings:** We love to tell our stakeholders about the ALU experience, our journey and our mission to make an impact. We may publish photographs and videos in the public domain that capture and showcase some of ALU's memorable moments, which may include certain Personal Data.

**ALU Experience and data analytics:** analysing Personal Data and feedback to assess the ALU journey/collaboration experienced by our stakeholders, to better understand the evolving needs of our different stakeholders and to improve and personalise our services and your ALU experience. This may include some Profiling and tracking of feedback, survey replies, transaction history with ALU etc.

**Surveys:** engaging with you for the purposes of obtaining your views on our Sites, our Apps, our products and/or our services.

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

We have a **legitimate interest** in carrying out the Processing, especially where published material is already in the public domain (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way). Withdrawal of consent may apply to any further publication, post withdrawal of consent.

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

We have a **legitimate interest** in carrying out the Processing (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way);

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or

We have a **legitimate interest** in carrying out the Processing for the purpose of conducting surveys, satisfaction reports and market research (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or

We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary

– it is not used for Processing that is necessary or obligatory in any way).

**For monitoring and/or reporting on our impact and the progress of the African Leadership mission:** We may lawfully collect and compile information from your different public social media profile(s), in order to better understand how you are evolving during and after your journey with ALU. We may also need to Process your Personal Data in order to meet reporting obligations with our funders.

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or  
We have a **legitimate interest** in carrying out the Processing for the purpose of providing our services or administering our Sites (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or  
We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary  
– it is not used for Processing that is necessary or obligatory in any way).

**Management of IT systems including our Sites, Apps, products, and services:** management and operation of our communications, IT and security systems; troubleshooting and audits (including security audits) and monitoring of such systems, as well as improving such systems, products and services.

The Processing is **necessary in connection with any contract** that you have entered into with us, or to take steps prior to entering into a contract with us; or  
We have a **legitimate interest** in carrying out the Processing (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or  
We have obtained **your prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary  
– it is not used for Processing that is necessary or obligatory in any way).

## **(G) Disclosure of Personal Data to third parties**

### **Summary**

We disclose Personal Data to the Controllers listed in this Policy below and to other persons or entities that are also engaged in the African Leadership mission, for legitimate operational purposes, in accordance with applicable law. There are also certain services and resources that are shared or provided between these entities that require the disclosure of Personal Data between them.

In addition, we lawfully disclose Personal Data to:

- you;
- such third parties that you instruct us lawfully to disclose to, in accordance with the applicable law;
- our funders and partners;
- legal and regulatory authorities, upon request, or where required under law, such as the tax authorities, the Registrar of Companies, the Data Protection Authority;
- third party Processors, Processing Personal Data on our behalf such as cloud services providers, insurance brokers, platform or IT service providers, payment service providers, customer service assistants, marketing and/or event agencies, security agents, maintenance and facilities management service providers etc.
- accountants and tax experts, auditors, lawyers, insurers and other external professional advisors;
- any relevant party, law enforcement agency and/or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- any relevant third party provider, where our Sites and our Apps use third party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may be

shared with the relevant third party provider. Please review that third party's privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data, together with any additional requirements under applicable law.

### **(H) Profiling\***

#### **Summary**

Some of the Personal Data that we Process is subject to automated decision-making and Profiling. However, please note that at ALU, we **do not** take decisions with respect to you, based solely on automated Processing. Should we ever result to such Processing, we will seek your consent to do so, where required under law.

We Process Personal Data for the purposes of automated decision-making and/or Profiling, which is carried out for the following purposes:

<b>Profiling activity</b>	<b>Logic of the Profiling activity</b>	<b>Consequences for you</b>
Product and service efficiency	Assessing efficiency of our products and services and their adaptability to certain persons e.g. our learning platforms and models.	We may ask you to provide feedback on your user experience and some information about you, in order to better understand the suitability and adaptability of the product and service for you. Following such feedback, learning platforms and models may be revised, improved and/or customised for you.
Impact Analysis	Monitoring our impact and meeting our reporting obligations towards our stakeholders, namely funders and/or partners.	This Profiling is conducted for our own operational purposes and to meet any reporting obligations that we may have. ALU is mainly funded through the generosity of its key partners, stakeholders and donors. In order to ensure a sustainable and trust-worthy relationship with our key stakeholders and demonstrate the impact of their investment, we may also collect, use and share with them, aggregated Demographic Data (usually about our students and alumni, ALU students with scholarships and their journey with ALU) but your identity is usually not visible to them, unless you have consented or contracted to specific reporting obligations or we have a legitimate interest to communicate the same. Should we need to disclose your identity and details to those key stakeholders, due to our reporting obligations, we will ensure that the same is done lawfully.
Performance management	Psychometric assessments to better assess performance	This Profiling activity will help ALU assess, monitor, and manage your job performance and assist in personal development. However, no

and personal development	and personal development needs.	decisions will be taken solely on this automated Processing.
Customised services	Marketing and advertising as well as customised services and support e.g. for subscribers of our Apps and/or our Alumni members, where we analyse their browsing activity on our Sites and Apps and their interests. This may also be through Cookies on our Sites and Apps. This information is analysed to personalise their experience with ALU.	You are free to consent or not to consent to any Profiling related to direct marketing and tracking activity on our Sites, provided that the latter Processing is not mandatory i.e. it is not used for Processing that is necessary or obligatory in any way. For example, Alumni members who are registered by us and have designated accounts, may, within the terms of their Alumni membership, be offered specific products and services that are likely to be of interest for them. This Profiling activity may mean that you receive communications that are not available to others.
Consolidating publicly available information	To better understand the profiles of our workforce members and their journey during and after ALU, which also enables us to monitor the impact of our ALU mission and the work that we are doing. This data may be collected from different public sources such as social media accounts.	This Profiling is conducted for our own operational purposes and to meet any reporting obligations that we may have. ALU is mainly funded through the generosity of its key partners, stakeholders and donors. In order to ensure a sustainable and trust-worthy relationship with our key stakeholders and demonstrate the impact of their investment, we may also collect, use and share with them, aggregated Demographic Data (usually about our students and alumni, ALU students with scholarships and their journey with ALU) but your identity is usually not visible to them, unless you have consented or contracted to specific reporting obligations or we have a legitimate interest to communicate the same. Should we need to disclose your identity and details to those key stakeholders, due to our reporting obligations, we will ensure that the same is done lawfully.

**\*By accepting the terms of this Privacy Policy, you accept and consent to the Profiling listed above, provided that this Processing is not mandatory i.e. it is not used for Processing that is necessary or obligatory in any way.**

**(I) International transfer of Personal Data**

**Summary**

We transfer Personal Data to recipients in other countries worldwide for the different reasons specified in this Policy.

ALU entities operate across several jurisdictions, namely in Mauritius and Rwanda and Personal Data will be shared between its different ALU entities and/or the other entities that are also engaged in the African Leadership mission, operating across the globe, for the reasons set out in this Policy.

Such data transfers shall be lawful and in accordance with such data sharing contractual clauses where required under law.

#### **(J) Data security**

##### **Summary**

We implement appropriate technical and organisational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us is sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us is sent securely.

#### **(K) Data accuracy**

##### **Summary**

We take every reasonable step to ensure that your Personal Data is kept accurate and up-to-date and is erased or rectified if we become aware of inaccuracies.

It is important that the Personal Data we hold about you is accurate and current. **Please keep us informed, if your Personal Data changes during your relationship with us.**

#### **(L) Data minimisation**

##### **Summary**

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary, in accordance with this Policy.

#### **(M) Data retention**

##### **Summary**

We take every reasonable step to ensure that your Personal Data is only retained for as long as it is needed in connection with a lawful purpose. Please ask to consult our Retention Policy.

The duration for retaining some of your Personal Data that we Process is follows:

1. For as long as we have ongoing dealings with you or we have a lawful ground for such Processing (as more fully detailed in this Policy) and thereafter for the duration of any limitation period under law or for the establishment, exercise or defence of legal rights, whichever is the longer.
2. If you consent to us Processing your Personal Data for direct marketing purposes, we will (subject to 1) in this section and the other terms of this Policy) continue such Processing until you unsubscribe or withdraw your consent to such direct marketing and request us to destroy your Personal Data.
3. CCTV recordings will be kept up to 90 days, subject to 1) in this section.
4. Any offers and proposals that we make that are not accepted by you, shall expire and be deleted (including Personal Data therein) after 6 months (unless such other validity date is stipulated therein), subject to 1) in this section.

5. If you apply for a job with ALU, you agree and consent to us holding onto your curriculum vitae for any future vacancies at ALU, for a further period of 1 year (subject to 1) in this section and the other terms of this Policy).

Once we have no further lawful reason to Process your Personal Data, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data, so that it is no longer Personal Data.

## **(N) Your legal rights**

### **Summary**

Subject to applicable law, you may have a number of rights with respect to Processing of your Personal Data, including:

1. **The right not to provide your Personal Data to us:** however, we may not be able to interact with one another or meet our respective contractual and/or legal obligations without such Personal Data.
2. **The right of access to your Personal Data:** You may request us a copy of the Personal Data that we Process about you, free of charge, unless the request is excessive, and verify that we are lawfully Processing that data.
3. **The right to request rectification:** You may request us to rectify or update Personal Data that we have on you, if there are any inaccuracies or the data is outdated.
4. **The right to request the erasure, or restriction of Processing, of your Personal Data:** Where it is lawful to do so, you may request us to:
  - erase such Personal Data for which there is no lawful ground for our Processing or you are able to successfully object to and put a stop to such Processing;
  - restrict the Processing of your Personal Data whilst exercising your legal rights or whilst we both or either of us is assessing the lawfulness of such Processing.
5. **The right to object to the Processing of your Personal Data:** where we Process your Personal Data on the basis of:
  - your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available lawful ground for Processing);
  - automated Processing and take decisions based solely on that automated Processing.
6. **The right to have your Personal Data transferred to another Controller** if this is provided under the relevant law and the data is easily transferable in electronic format.
7. **The right to lodge complaints with our Data Protection Officer (details below) and/or the Data Protection Authority.**

In exercising any of the above rights, you will need to provide reasonable evidence of your identity before we can Process your requests.

Requests will be treated within reasonable delays and in accordance with applicable law. For the erasure of your Personal Data, you will be contacted by us and informed of a reasonable timeframe for effective erasure, in view of the volume and location of such data.

## **(O) Cookies and similar technologies**

### **Summary**

We Process Personal Data by using Cookies and similar technologies. For more information on how we use Cookies for Processing your Personal Data, please see our Cookie Policy on our Sites and Apps.

Cookies enable us to collect information about your device, your browsing activity and habits, and conduct Profiling. However, such Processing through use of Cookies, shall always be with your consent, where required under applicable law.

## **(P) Terms of Use**

### **Summary**

Please consult our Terms of Use on our Sites and Apps which govern access to and use of those functionalities. We encourage you to read our Terms of Use regularly, for any changes we might make from time to time.

## **PROPRIETARY NOTICE AND DISCLAIMER**

All content featured on our Sites (including photos, design, codes, texts, logos and trademarks) is the sole property of ALU Foundation or its relevant subsidiary and cannot be used by any third party without the prior consent of ALU Foundation or its relevant subsidiary. Such content is provided for indicative purposes only and is non-contractual.

## **(Q) Communications and Direct marketing**

### **Summary**

We would love to keep you informed about our mission, our latest events, news and about the hard things that we are doing to make an impact!

### **Communications:**

ALU has centralised instant messaging systems and intranet type platforms to ensure effective internal communications. As part of the ALU team and your contractual arrangement with us, we and designated ALU personnel are entitled to communicate to you and the rest of ALU:

- ALU's latest news and achievements as well as other valuable information for the furtherance of ALU's mission and objectives, or your personal growth and development;
- certain offers and privileges that are accessible to the organisation.

Some of our organisation-wide platforms also allow knowledge sharing between members of our workforce.

### **Direct Marketing:**

In the event of any direct marketing that is specifically targeted to you, you will be requested to provide your consent before we proceed with such direct marketing and you may unsubscribe or opt-out at any time, by informing us or clicking on the unsubscribe option that is made available to you. We may contact you via email, SMS, WhatsApp, instant messaging, by phone and/or such other common communication means. Where possible, we would love for you to co-create with us your ALU experience. We will therefore try to provide you with the options to choose how you want us to contact you.

*What does your consent include?* When you consent to hearing direct marketing from ALU and its products and services, it is understood that:

- the consent is given to all "ALU", being ALU Foundation and its subsidiaries, namely those listed as controllers below as well as those entities engaged in the African Leadership mission;
- such Processing shall also include Profiling related to direct marketing, so that we may better personalise your ALU experience and reach out to you about news and offers that are likely to be of particular interest to you; and

- you may reach out to us about your ALU experience or we may contact you to participate in any surveys or provide feedback. We care a lot about your ALU experience and work hard to make it a great and impactful one!

If you unsubscribe, we will be sad to see you go and you will cease to receive direct marketing from ALU unless you decide to apply your unsubscription to certain ALU entities only, and not all of them. If we receive your unsubscription, we will contact you and inform you of the reasonable timeframe and process for implementation so that our records are updated accordingly.

## (R) Details of Controllers

### Summary

There are several ALU entities that act as Controllers for the purposes of this Privacy Policy.

For the purposes of this Policy, the relevant Controllers are:

<u>Name of Controller</u>	<u>Controller's details</u> <u>(Jurisdiction, Company No)</u>	<u>Contact Details</u>
<b>ALU Foundation</b>	Mauritius, Foundation No. 561	African Leadership Campus, Powder Mill Road, 21001 Pamplemousses MAURITIUS
<b>African Leadership Unleashed Ltd</b>	Mauritius, Business Registration No. C14125052	
<b>ALU Real Estate Ltd</b>	Mauritius, Business Registration No. C16140909	
<b>African Leadership University Ltd</b>	Rwanda, Company Code. 103772473	African Leadership University, Innovation City, Kigali, RWANDA
<b>Innovation City Campus Ltd</b>	Rwanda, Company Code. 107887433	

Our Data Protection Officer is contactable using the details set out above OR filling in this form.

Should you have any queries or requests regarding your Personal Data, please contact us by filling in this form.

### (S) Definitions

- **"App(s)"** means any application made available by us (including where we make such applications available via third party stores or marketplaces, or by any other means).
- **"Cookie"** means a small file that is placed on your device when you visit a website (including our Sites). In this Policy, a reference to a "Cookie" includes analogous technologies such as web beacons and clear GIFs.
- **"Controller"** means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **"Data Protection Authority"** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws in a given jurisdiction.
- **"Demographic Data"** means information about groups of people according to certain attributes such as age, gender, place of residence, and can include socio-economic factors such as occupation, family status, or income.
- **"Personal Data"** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- **"Process", "Processing" or "Processed"** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **"Processor"** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **"Profiling"** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict

aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

- **"relevant Personal Data"** means Personal Data in respect of which we are the Controller.
- **"Sensitive Personal Data" or "Special Categories Personal Data"** means for the purposes of this Policy, Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life or preferences, any actual or alleged criminal offences or penalties, biometric data
- **"Site(s)"** means any website operated, or maintained, by us or on our behalf.

**(T) Revision History**

Approved amendments to this Policy are detailed in the Revision History Table below:

Revision History		
Revision Ref	Description of Revision	Effective date of revision

**Version 1.0**

**Date published:**

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