



Introduction

MARKETING AND COMMUNICATION PRIVACY NOTICE

Kirinyaga University is registered as a Data Controller with the Office of the Data Protection Commissioner (ODPC) and we are committed to ensuring that the data we process is handled in accordance with the **Kenya Data Protection Act, 2019** and its Regulations.

Kirinyaga University wishes to communicate with those people who have expressed an interest in studying at the University (enquirers) and current applicants in order to keep them informed of areas of information that may be of interest and help them to decide whether to study at the University.

2. What do you communicate to me about?

Areas of information we wish to inform you about include, but are not limited to:

- i. University rankings and achievements
- ii. Testimonials from current students and alumni
- iii. Accommodation options
- iv. Fees, finance, and scholarships
- v. On-campus events and activities
- vi. Key dates in the application process
- vii. New academic programmes (Engineering, Health Sciences, Agriculture, Business, ICT)

From time to time the University may contact you requesting your participation in market research surveys in order to enhance and improve our application process, communication channels, and academic programmes.

3. Which communication channels do you use?

The University will communicate via a variety of channels which will be determined by the contact details provided by you, including but not limited to:

- i. Email
- ii. Telephone
- iii. SMS
- iv. WhatsApp
- v. Zoom / Google Meet
- vi. Social Media channels (Facebook, Twitter, Instagram, LinkedIn)
- vii. Postal Mail
- viii. Any other mode of communication available

4. How do you process my personal information?

The University may analyze your personal information to create a profile of your interests and preferences so that we can ensure that the information we contact you with is relevant to you.

If you have provided your information in order to attend an event at the University (e.g., open day, career fair, orientation), we will use that information to provide you with details about that event. If you do not wish to receive any further information from us, you will be able to opt out of those communications at the time of registering for the event.

5. Under what legal basis does the processing of my personal data take place?

The Data Protection Act 2019 provides for a number of different legal bases under which processing of personal data may take place. In this case, the following bases apply:

(a) Consent (enquirers): When you provide us with your details, we will ask for your consent to use those details to carry out the activities as detailed above. If you no longer wish to receive communication from us, you can withdraw your consent at any time by contacting the University at dpo@kyu.ac.ke or updating your contact preferences.

(b) Contract (applicants): As you have applied for an academic programme, the University will provide you with information to help you decide whether to accept an offer of a place, should the University choose to make you one.

(c) Legitimate interests (applicants): We process personal information for certain of our own legitimate business purposes such as:

- i. Where the processing enables us to enhance, modify, personalize, or otherwise improve our services/communications for your benefit
- ii. To better understand how people interact with our websites
- iii. To provide communications which we think will be of interest to you (direct marketing)
- iv. To determine the effectiveness of promotional campaigns and advertising

We will not process your data for the legitimate interests of any third parties.

These legitimate interests do not override your own interests as they are to provide you with the services and information you may need to make the right decision on where you choose to study. However, if you would like us to stop using your information in this way, please contact the University at dpo@kyu.ac.ke or update your contact preferences.

Please bear in mind that if you make a request to us to stop using your information, this may affect our ability to carry out tasks indicated above for your benefit.

6. What categories of personal data are used?

All information necessary to provide you with relevant information with regards to your interest in Kirinyaga University. This might include but is not limited to:

- i. Name
- ii. Contact details (phone, email, postal address)
- iii. Date of Birth
- iv. Postcode / County of residence
- v. Study Level (Certificate, Diploma, Undergraduate, Postgraduate, PhD)
- vi. Subject area of interest (e.g., Engineering, Health Sciences, Business, Education, Agriculture, ICT)
- vii. Country of residence, Nationality, or Status of Residence in Kenya
- viii. Anticipated year of entry for study
- ix. Current educational status or qualifications (KCSE mean grade, prior degree)
- x. Disability status
- xi. Original enquiry source (marketing fairs, University event, website, KUCCPS referral)
- xii. Academic programme applied for
- xiii. Current school or college (where relevant)
- xiv. Application status (e.g., offer made, offer accepted, offer declined, deferred)
- xv. Details of any specific questions you ask of us
- xvi. IP address(es) and cookie identifiers

7. Where do we get your personal data from?

Personal data will be provided by you either directly or indirectly:

Directly:

- i. In the course of making an enquiry at an event, through the University website, or by making an application to study at the University
- ii. Via our live chat service on our website
- iii. During campus visits or open days at KyU

Indirectly:

- i. In the course of making an enquiry through an agent, partner institution, or providers where you submit your details to be provided with information from the University
- ii. Indirectly in the course of making an application through the KUCCPS portal, our website, or an agent

In addition to browsing our website, we make use of these technologies to help determine whether our emails are effective and relevant to you through tracking image pixels and hyperlinks. We only do this when you have granted consent for Kirinyaga University to send you emails, for example when you complete an online form. You can, at any time, request to stop receiving these emails by contacting us at dpo@kyu.ac.ke or updating your contact preferences.

8. Who else do we pass this information on to?

Your personal data will only be shared with those third parties with whom the University works in order to provide you with relevant, personalized communications. These types of organizations can include but are not limited to:

- i. Suppliers of digital content for emails (such as Google Workspace, Mail chimp)
- ii. Service providers who send out emails, SMS, direct mail, or other communications on behalf of the University
- iii. Providers who manage our live chat and similar services
- iv. Providers who will use your profile information to identify others who may be interested in the University (e.g., targeted advertising on social media)

Other than the University's own processors and contractors, no information will be passed to third-party organizations for them to contact you directly themselves.

9. Do we transfer the information overseas?

Data will be transferred from overseas only where contact information has been provided to University staff or agents in the course of making an enquiry about study at the University (e.g., international students from Uganda, Tanzania, Rwanda, Burundi, or beyond). In such cases, appropriate safeguards are applied in line with the Data Protection Act 2019.

10. How long do we keep this information for?

Personal data will be held up to a maximum of **7 years**. This is because we understand that your original enquiry to study may be for a later academic year, and you may then have further educational needs as you progress through your original course of choice or return for postgraduate studies.

If, at any time, you would like to stop receiving these communications, you can contact **dpo@kyu.ac.ke** or update your contact preferences.

11. What are your rights as a data subject?

As a person whose personal data we are processing, you have certain rights with respect to that personal data. You have the right:

- i. **To withdraw consent** at any time
- ii. **To access** your personal data that, we process
- iii. **To rectify** inaccuracies in personal data that we hold about you if it is inaccurate or incomplete
- iv. **To request the deletion or removal** of your personal data where there is no compelling reason for its continued processing (right to be forgotten)
- v. **To restrict the processing** of your personal data in certain ways
- vi. **To obtain your personal data for reuse** (data portability)
- vii. **To object** to certain processing of your personal data

12. Who can I contact if I have any queries?

If you have any questions about how your personal information is used by the University as a whole, or wish to exercise any of your rights, please consult the University's Data Protection Officer:

Data Protection Officer
Kirinyaga University
Email: dpo@kyu.ac.ke
Phone: +254 709 742 000

13. Complaints

If you wish to raise a complaint about how we have handled your personal data, you can contact the University Data Protection Officer who will investigate the matter.

Our Data Protection Officer can be contacted at **dpo@kyu.ac.ke**, by calling **254 709 742000**, or by writing to:

Data Protection Office
Kirinyaga University
P.O. Box 143 – 10300
Kerugoya, Kenya

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Office of the Data Protection Commissioner(ODPC):

<https://www.odpc.go.ke>

14. Updates to this privacy notice

We may update this privacy notice from time to time in response to changing legal, technical, or business developments. When we update our privacy notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

Kirinyaga University

Aspect	Kirinyaga University
DPO Email	dpo@kyu.ac.ke
Phone	254 709 742000
Address	P.O. Box 143 – 10300, Kerugoya

Aspect	Kirinyaga University
Programme examples	Engineering, Health Sciences, Agriculture, Business, Education, ICT
Local context	Kirinyaga County, Kutus Campus
Enquiry sources	KUCCPS, Kirinyaga County schools, local events