SOL PLAATJE UNIVERSITY

PRIVACY NOTICE

This privacy notice ('Notice') describes how your personal information ('PI') is used by Sol Plaatje University ('SPU') as a result of your engagement with SPU. This will without limitation include which PI is collected by SPU, how it is used and why. This Notice applies to all and any PI gathered from (amongst others) SPU's current and former students, employees, research participants, alumni, contractors or service providers and donors.

Protecting your privacy is very important to SPU. The following information will help you understand the purposes for which we collect, store and use your information.

SPU must collect and process certain PI about you when you engage with SPU, to enable us to manage our relationship with you and run SPU. This PI will come directly from you or from other sources, including external sources. SPU's collection and processing of your PI is subject to all relevant legislation and to SPU's Policies. We will keep your information confidential and will only share your information if we are legally required to do so, if we must do so in order to fulfil our agreement with you or if you have given your consent. This privacy notice is part of our agreement with you. We may need to update it from time to time, but we will inform you when we do. You should read this notice along with the terms and conditions that apply to the products or services you use.

Should you engage with SPU, whether as an employee, student, donor or otherwise, SPU may collect PI about you. This PI includes, amongst others, information relating to your education, your financial or employment history, your contact details, any references, and other private or confidential information.

1. HOW SPU COLLECTS YOUR PERSONAL INFORMATION

In most cases, SPU collects PI directly from yourself during the application or recruitment process, or from our interactions with you during your enrolment or employment with SPU, or when you conduct business or make enquiries with SPU. In some cases we may collect PI about you from sources other than yourself, including from references that you provide to SPU, from previous educational establishments and from public records.

2. PURPOSE FOR WHICH YOUR PERSONAL INFORMATION IS BEING COLLECTED

SPU collects your PI for various purposes. Some of these purposes and the ways in which SPU uses your PI include the following:

2.1 To pursue SPU's legitimate business interests;

2.2 To meet our obligations as an educational institute and employer;

2.3 To provide teaching, learning and research;

2.4 To manage your use of and access to SPU's facilities;

2.5 To operate security, disciplinary, compliant and quality assurance processes and arrangements;

2.6 To comply with our contractual obligations to you and to others;

2.7 To comply with legal requirements and obligations imposed on us by law;

2.8 If necessary, in order to pursue your own vital interests (e.g., medical or other emergency response); and

2.9 To ensure that our IT facilities, networks and communication systems are secure.

3. WHETHER THE SUPPLY OF YOUR PI IS VOLUNTARY OR MANDATORY

When you engage with SPU, we will need to use your PI for SPU's administrative, educational or other business related purposes. Without processing your PI, it will not be possible for SPU to fulfil its obligations, whether under contract with you or in terms of SPU's statutory obligations. Your consent is not required where SPU is required to process your PI to fulfil its obligations under contract with you or in terms of the other justifications prescribed by the Protection of Personal Information Act (2013). Nonetheless, withholding your PI may obstruct or prevent SPU from being able to render services to you and carry out its obligations, under contract or in law. For a complete list of all laws that are applicable to SPU, some of which authorise or require the collection of PI, please refer to SPU's PAIA Manual.

4. SPU'S COLLECTION AND PROCESSING OF SPECIAL PERSONAL INFORMATION

In some cases, SPU will also collect and process special personal information ('SPI') about you. SPI includes information related to your religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometrics or criminal behaviour.

We collect SPI for specific purposes, such as:

4.1 Collecting health related information to provide health benefits or accommodate a disability;

4.2 Monitoring safety, industrial hygiene and exposures in our facilities;

4.3 Collecting diversity-related information (such as gender and race) to comply with legal obligations and internal policies relating to diversity and non-discrimination; or

4.4 Collecting biometric information for security purposes or to facilitate your access to SPU's systems.

Generally, SPU's collection and processing of such SPI will be conducted only with your voluntary consent, upon disclosure of the purposes for which such SPI is processed. However, your SPI will also be processed if SPU is required to do so to comply with obligations imposed on it by law, or for making or defending legal claims.

5. TRANSFER AND SHARING OF PERSONAL INFORMATION

Access to SPI is limited to those who have a need to know such information, for the purposes described in this Notice, including functional support in SPU's HR, IT, Legal and Finance departments.

In some cases, PI is shared with third parties such as vendors, contractors and other University service providers, external examiners and assessors, and external individuals that participate on SPU's panels, committees or other structures, as well as with legal and regulatory authorities. In certain instances, these third parties are entities or individuals resident in countries outside of South Africa or forming part of international organisations.

In all instances, the sharing and transfer of your PI is necessary in order to meet our contractual obligations with you, or on other lawful and recognised grounds, and is carried out with appropriate safeguards in place to ensure the confidentiality and security of your PI.

6. YOUR RIGHTS TO YOUR PERSONAL INFORMATION

As a data subject you have a number of rights in relation to your PI. You can, amongst others:

6.1 require SPU to confirm whether or not we hold any of your PI;

6.2 require us to amend incorrect or incomplete PI;

6.3 object to the, or require SPU to stop, processing your PI, for example where the processing of your PI is no longer necessary;

6.4 require us to erase your PI;

6.5 where our processing of your PI is based solely on your consent, you may withdraw that consent; or

6.6 receive from us the PI we hold about you, which you have provided to us, including for the purpose of you transmitting that PI to another responsible party.

Please note that the above rights are not absolute, and SPU may be entitled to refuse requests where exceptions apply.

For further information, or if you wish to exercise any of these rights, or if you have a complaint about the way you believe your PI is being processed, in the first instance, please contact SPU's Deputy Information Officer, the details of which are set out in SPU's PAIA Manual.

If you have a complaint and you remain dissatisfied with how your complaint has been dealt with you may take your complaint to the Information Regulator who can be contacted at enquiries@inforegulator.org.za.

7. CHANGES TO THIS PRIVACY NOTICE

SPU has the right to update this Notice.

8. CONTACTING SPU

Questions, requests and inquiries concerning this Notice, and the information set out in this Notice, may be directed to SPU's Deputy Information Officer at coo@spu.ac.za.