



OFFICE OF THE PRINCIPAL DIGITIZATION AND DATA PROTECTION OFFICER

General Privacy Notice – Human Resources Department Forms

Data Controller: Mount Kenya University (MKU)

Mount Kenya University (MKU) is committed to protecting the privacy and security of personal data collected and processed through its Human Resources Department forms and related employment processes. This Privacy Notice explains how MKU collects, uses, stores, protects and discloses personal data in accordance with the **Data Protection Act, 2019** and applicable data protection requirements.

1. Personal Data We May Collect

Depending on the purpose of the particular Human Resources form, MKU may collect and process personal data including:

- Full name;
- Staff/employee identification number;
- National identification/passport details, where applicable;
- Contact and address details;
- Date of birth and other identification information where necessary;
- Employment and professional information;
- Academic and professional qualifications;
- Curriculum vitae and employment history;
- Department, School, Campus, Directorate or organizational unit;
- Job title, grade and employment details;
- Bank and payment information, where applicable;
- Tax and statutory information;
- Next-of-kin and emergency contact information;
- Attendance, leave and absence information;
- Performance and appraisal information;
- Training, development and competency records;
- Recruitment and interview information;
- Disciplinary and grievance information;

- Benefits, pension and insurance information;
- Staff photographs, where applicable;
- Signatures and authorization details;
- Supporting documents and attachments; and
- Other personal information necessary for the administration of the employment relationship.

Where sensitive personal data is required for a legitimate HR purpose, MKU will process such information in accordance with applicable legal requirements and appropriate safeguards.

2. Purposes of Processing

Personal data collected through Human Resources forms may be processed for purposes including:

- Recruitment, selection and appointment;
- Establishment and administration of employment relationships;
- Staff identification and personnel administration;
- Payroll and benefits administration;
- Leave, attendance and absence management;
- Performance management and appraisal;
- Staff training, development and capacity building;
- Promotion, deployment and career progression;
- Staff welfare and employee support;
- Pension, insurance and other employee benefits;
- Disciplinary and grievance management;
- Workplace health, safety and security, where applicable;
- Compliance with employment, tax, pension, immigration and other applicable legal requirements;
- Internal audit, investigations and institutional governance;
- Workforce planning and reporting;
- Maintaining accurate personnel and employment records; and
- Other legitimate institutional purposes connected with the management of the University's workforce.

3. Lawful Basis for Processing

MKU processes personal data collected through Human Resources forms on lawful grounds provided under applicable data protection law, including where processing is necessary to:

- Comply with a legal or regulatory obligation;
- Enter into, perform or administer an employment relationship or other agreement;

- Perform a task carried out in the public interest or in the exercise of official authority, where applicable;
- Pursue legitimate institutional interests, where applicable and where the rights and interests of the data subject are appropriately considered; or
- Process the information with the data subject's consent where consent is required by law.

4. Sharing and Disclosure of Personal Data

Personal data may be accessed by authorized MKU officers, including Human Resources personnel, supervisors, managers and other relevant University offices where access is necessary for legitimate institutional purposes.

Where required or permitted by law, relevant information may also be shared with:

- Statutory and regulatory authorities;
- Government agencies;
- Pension and insurance providers;
- Healthcare or occupational health service providers, where applicable;
- Banks and payment service providers;
- Auditors and professional advisers;
- Law-enforcement agencies and courts where lawfully required;
- Authorized service providers and data processors; and
- Other authorized parties where disclosure is necessary for a legitimate HR or institutional purpose.

MKU will take appropriate measures to ensure that personal data is disclosed only to authorized recipients and for legitimate purposes.

5. Data Security and Confidentiality

MKU implements appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, alteration, disclosure, destruction or other unlawful processing.

Human Resources records may be maintained in physical and electronic formats. Access to personnel records will be restricted to authorized persons based on their roles and responsibilities.

MKU will maintain appropriate confidentiality safeguards when processing employee information.

6. Data Retention

Personal data collected through Human Resources forms will be retained for as long as necessary to fulfil the purposes for which it was collected and in accordance with applicable employment, statutory, audit, records-management and institutional retention requirements.

When personal data is no longer required, MKU will securely dispose of, delete, anonymize, or otherwise handle it in accordance with MKU's approved records-retention procedures and applicable law.

7. Your Data Protection Rights

Subject to applicable legal conditions and limitations, data subjects have rights in relation to their personal data, including the right to:

- Be informed about the collection and use of their personal data;
- Access their personal data;
- Request correction of inaccurate or misleading personal data;
- Object to certain forms of processing;
- Request restriction of processing where applicable;
- Request deletion of personal data where legally applicable; and
- Exercise other rights provided under applicable data protection law.

Some requests may be subject to legal, employment, statutory, regulatory or records-retention requirements.

8. Accuracy of Information

Employees, applicants and other persons completing Human Resources forms are responsible for providing information that is accurate, complete and up to date.

Where information changes or an error is identified, the relevant Human Resources office should be notified promptly so that appropriate corrective action can be taken.

9. Data Protection Queries and Requests

For questions concerning the processing of personal data, or to exercise applicable data protection rights, please contact:

Data Protection Officer
Mount Kenya University (MKU)
Email: dataprotection@mku.ac.ke
Telephone: 0709 153 165

Privacy Notice on Human Resources Forms

The following abbreviated notice may be placed directly on MKU Human Resources forms:

PRIVACY NOTICE: Mount Kenya University collects and processes the personal data provided in this form for purposes related to recruitment, employment administration, staff management, payroll and benefits, leave and attendance, performance management, training and development, statutory and regulatory compliance, and other legitimate institutional purposes. Your information will be accessed only by authorized persons and may be disclosed to authorized third parties where necessary or required by law. MKU will apply appropriate safeguards and retain the information in accordance with applicable legal and institutional requirements. You have rights regarding your personal data under the Data Protection Act, 2019. For enquiries or to exercise your data protection rights, contact the University Data Protection Officer at dataprotection@mku.ac.ke or 0709 153 165.

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Review Date: