



OFFICE OF THE PRINCIPAL DIGITIZATION AND DATA PROTECTION OFFICER

General Privacy Notice - Procurement and Stores Departments

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 Procurement and Stores Departments. This Privacy Notice explains how MKU collects, uses, stores, protects and discloses personal data in connection with procurement, purchasing, supplier management, receiving, storage, issuance and inventory-related activities.

Personal data will be processed in accordance with the **Data Protection Act, 2019** and applicable data protection requirements.

1. Personal Data We May Collect

Depending on the particular procurement or stores process, MKU may collect and process personal data including:

- Full name;
- Staff/employee identification number, where applicable;
- National identification/passport details, where applicable;
- Contact details;
- Department, School, Directorate, Campus or organizational unit;
- Job title and role;
- Supplier/vendor or company contact information;
- Business registration and statutory information, where applicable;
- Tax-related information, where applicable;
- Bank and payment details, where applicable;
- Tender, quotation and procurement-related information;
- Supplier registration and prequalification information;
- Bid and tender submission information;
- Contract and purchase order information;
- Delivery and goods-receiving information;
- Signatures and authorization details;

- Information relating to requisitions, approvals and procurement transactions;
- Stock issue, receipt and return records;
- Supporting documents and attachments; and
- Other personal data reasonably necessary for legitimate procurement and stores functions.

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

2. Purposes of Processing

Personal data collected through Procurement and Stores processes may be processed for purposes including:

- Supplier registration, evaluation, prequalification and management;
- Requesting and evaluating quotations, bids and tenders;
- Procurement planning and processing;
- Preparation and management of purchase orders and contracts;
- Verification and approval of procurement transactions;
- Receiving and verifying goods and services;
- Inventory and stock management;
- Issuing, transferring and returning University assets and supplies;
- Maintaining procurement and stores records;
- Processing supplier payments and related financial transactions;
- Monitoring supplier and contract performance;
- Conducting procurement reviews, audits and investigations;
- Preventing and detecting fraud, corruption and other unlawful activities;
- Compliance with applicable procurement, tax, financial and other legal requirements;
- Reporting to authorized management, regulators and other relevant authorities;
- Supporting accountability, transparency and institutional governance; and
- Other legitimate institutional purposes related to procurement and stores operations.

3. Lawful Basis for Processing

MKU processes personal data collected through Procurement and Stores processes on lawful grounds provided under applicable data protection law, including where processing is necessary to:

- Comply with a legal or regulatory obligation;
- Perform or administer a contract or transaction;
- Conduct procurement and related institutional functions;

- 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.

4. Sharing and Disclosure of Personal Data

Personal data may be accessed by authorized MKU officers and departments where access is necessary for legitimate procurement, stores, financial, administrative, audit or governance purposes.

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

- Government ministries, departments and agencies;
- Procurement and regulatory authorities;
- Auditors and professional advisers;
- Banks and authorized payment service providers;
- Tax authorities and other statutory bodies;
- Law-enforcement agencies and courts where lawfully required;
- Procurement committees and authorized evaluation committees;
- Authorized service providers and data processors; and
- Other authorized parties where disclosure is necessary for a legitimate institutional purpose or required by law.

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

5. Confidentiality and Data Security

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

Procurement and Stores records may be maintained in physical and electronic formats. Access to procurement, supplier and inventory records will be restricted to authorized persons based on their roles and responsibilities.

Confidential procurement information will be handled in accordance with applicable University policies, procedures and legal requirements.

6. Data Retention

Personal data collected through Procurement and Stores processes will be retained for as long as necessary to fulfil the purposes for which it was collected and in accordance with applicable procurement, financial, audit, legal, regulatory and institutional records-retention requirements.

When personal data is no longer required, it will be securely disposed of, deleted, anonymized or otherwise handled 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, procurement, contractual, audit, regulatory or records-retention requirements.

8. Accuracy of Information

Persons providing information to MKU through Procurement and Stores processes are responsible for ensuring that the information provided is accurate, complete and up to date.

Where information changes or an error is identified, the relevant Procurement or Stores 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 for Procurement and Stores Forms

The following abbreviated notice may be placed directly on MKU Procurement and Stores forms:

PRIVACY NOTICE: Mount Kenya University collects and processes the personal data provided in this form for purposes related to procurement, supplier management, purchasing, receiving, stores and inventory management, accountability, audit, statutory and regulatory compliance, and other legitimate institutional purposes. Your information will be accessed only by authorised persons and may be disclosed to authorised 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.

Privacy Notice Version: 1.0

Effective Date: 5th Jan 2025

Review Date: