



Mount Kenya University

OFFICE OF THE PRINCIPAL DIGITIZATION AND DATA PROTECTION OFFICER

General Privacy Notice – Transport Department

1. Data Controller

Mount Kenya University (MKU) is the Data Controller responsible for the collection and processing of personal data in connection with the University's transport services and activities.

MKU is committed to protecting personal data and processing it in accordance with the **Data Protection Act, 2019**, applicable regulations, and the University's data protection policies and procedures.

2. Personal Data We May Collect

The Transport Department may collect and process the following categories of personal data, where necessary:

- Full name;
 - Staff/student identification number;
 - National ID or passport details, where required;
 - Telephone number and other contact details;
 - Department, School, Directorate, Campus or ODeL Centre;
 - Driver's licence and driver identification details;
 - Vehicle registration number and other vehicle details;
 - Vehicle allocation and driver assignment information;
 - Passenger details;
 - Transport request, booking and authorization information;
 - Journey/trip details, including date, time, destination, route and purpose of travel;
 - Vehicle entry and exit records;
 - Signatures and acknowledgements;
 - GPS/location or vehicle-tracking information, where applicable;
 - Accident, incident and transport-related reports;
 - Emergency contact information, where necessary;
 - Fuel, mileage and vehicle utilization records where linked to an identifiable individual;
- and

- Any other information reasonably necessary for the safe and effective administration of University transport services.

3. Purposes of Processing

MKU may process personal data for purposes including:

- Receiving and managing transport requests and bookings;
- Allocating University vehicles and authorized drivers;
- Managing staff, student, visitor and authorized passenger transportation;
- Maintaining passenger, driver and journey records;
- Monitoring vehicle movement, utilization and operational activities;
- Managing vehicle access and control;
- Ensuring the safety and security of passengers, drivers and University property;
- Planning and coordinating routes and transport services;
- Managing accidents, incidents, emergencies and related investigations;
- Responding to transport-related complaints and queries;
- Preventing and investigating misuse, theft, fraud or unauthorized use of University vehicles;
- Maintaining transport, mileage, fuel and vehicle utilization records;
- Supporting audit, accountability and institutional reporting;
- Complying with legal, regulatory and institutional requirements; and
- Performing other legitimate University functions related to transport administration and management.

4. Lawful Basis for Processing

MKU will process personal data on one or more applicable lawful bases, including:

- Compliance with a legal or regulatory obligation;
- Performance of a contract or provision of a service;
- Performance of a task carried out in the public interest or in accordance with applicable institutional authority;
- Protection of the safety and security of individuals and University property;
- Legitimate institutional interests, where applicable; and
- Consent, where consent is required by law.

5. GPS, Vehicle Tracking and Monitoring

Where applicable, University vehicles may be fitted with GPS or other vehicle-monitoring systems. Such systems may collect information relating to vehicle location, movement, routes, journey times and vehicle utilization.

This information may be used for transport administration, safety, security, route planning, vehicle management, incident investigation, accountability and protection of University assets.

Where transport facilities involve CCTV or other monitoring technologies, relevant personal data may also be collected and processed for security, safety and operational purposes.

6. Sharing and Disclosure of Personal Data

Personal data may be accessed or disclosed, where necessary and lawful, to:

- Authorized MKU staff and offices involved in transport administration, security, finance, administration and management;
- Relevant government agencies and regulatory authorities;
- Law enforcement agencies or courts where legally required or authorized;
- Emergency response providers where necessary for the protection of life, health or safety;
- Insurance companies, assessors and other authorized parties in relation to accidents or claims;
- Auditors and professional advisers;
- Authorized transport, security, technology or other service providers acting as data processors; and
- Other authorized parties where disclosure is required or permitted by law.

MKU will only disclose personal data where there is a lawful basis and appropriate safeguards are in place.

7. Data Security and Confidentiality

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

Access to transport records will be restricted to authorized persons who require the information to perform their official duties.

8. Data Retention

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, meet operational requirements, resolve disputes, support investigations, and comply with applicable legal, regulatory, audit and institutional record-retention requirements.

When personal data is no longer required, it will be securely disposed of, deleted or anonymized in accordance with applicable University procedures.

9. Your Data Protection Rights

Subject to applicable legal conditions and limitations, data subjects may have rights to:

- Be informed about the use of their personal data;
- Access their personal data;
- Request correction of inaccurate or incomplete personal data;
- Request deletion of personal data where applicable;
- Object to certain processing activities;
- Request restriction of processing in applicable circumstances;
- Withdraw consent where processing is based on consent; and
- Lodge a complaint with the relevant data protection authority.

Requests concerning personal data should be directed to the University Data Protection Officer.

10. Accuracy of Information

Individuals providing personal data are expected to provide accurate, complete and up-to-date information and to notify the University where relevant information changes.

11. Contact the Data Protection Officer

For enquiries concerning this Privacy Notice, personal data processing, or to exercise applicable data protection rights, please contact:

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

SHORT PRIVACY NOTICE FOR TRANSPORT FORMS AND REGISTERS

PRIVACY NOTICE: Mount Kenya University collects and processes the personal data provided in this form/register for purposes related to transport administration, transport requests and bookings, driver and passenger management, vehicle allocation, journey monitoring, safety and security, vehicle and asset management, incident management, accountability, audit and compliance with applicable legal and institutional requirements. 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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