
Document title: Data Protection Policy

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Office/department responsible: All TKH Departments

Approved by: Dr. Mahmoud Allam – President of The Knowledge Hub Universities

Data Protection Policy

Policy Statement/Purpose

The purpose of this Data Protection Policy (hereinafter referred to as the “Policy”) is to outline the framework through which The Knowledge Hub Universities (hereinafter referred to as “TKH”) and the Coventry University Branch at The Knowledge Hub Universities (hereinafter referred to as “CUB-at-TKH”), achieve compliance with the requirements of the Data Protection Regulation, and any other applicable laws and regulations relating to the processing of personal data and privacy (hereinafter referred to as the “Legislation”).

Supporting Department

Responsible University Official: Khaled Mubarek - IT Manager

For any questions, please send an email to: it.support@tkh.edu.eg

Overview

This Policy ensures that the TKH and the CUB-at-TKH adheres to the aims of the Legislation and all other applicable data protection and privacy legislation by ensuring that personal data is used in a way that is fair to individuals and protects their rights.

As the laws in relation to data protection and privacy is constantly under review, this Policy may need to be amended and updated from time to time so as to bring it in line with any future (or amended) legislation, regulations, directives, codes of practice or guidance. Where appropriate we will notify staff and students of those changes by email or by a statement on our website directed to staff and students.

Who needs to know this policy

This Policy applies to all staff and students of TKH and CUB-at-TKH.

This Policy applies to personal data as defined by the Legislation i.e. information relating to an identifiable natural person (“Data Subject”).

An identifiable natural person is anyone who can be identified directly or indirectly by reference to things such as their name, identification number, location, online identifier or one or more factors specific to physical, psychological, genetic, mental, economic, cultural or social identity of that natural person. This includes information held on electronic files, paper files, photographs, audio recordings and CCTV or webcam footage.

All staff, students and other persons or third parties, engaged by, with or on behalf of TKH and CUB-at-TKH are obliged to comply with this Policy when processing personal data on behalf of the TKH and CUB-at-TKH or as part of your employment and/or studies with TKH and CUB-at-TKH. Any breach of this Policy may result in disciplinary action.

The Policy

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1. The Principles

The Legislation sets out what constitutes good information handling by reference to principles relating to the processing of personal data which can be summarised as follows:

Personal data shall be:

- processed lawfully, fairly, and in a transparent manner in relation to the Data Subject – ‘lawfulness’, ‘fairness’ and ‘transparency’;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes – ‘purpose limitation’;
- be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed – ‘data minimisation’;
- be accurate and, where necessary, kept up to date – ‘accuracy’;
- kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes which the personal data are processed – ‘storage limitation’; and,
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures – ‘integrity and confidentiality’.

2. Fair, lawful and transparent processing

TKH and CUB-at-TKH provide prospective students, applicants and students who have enrolled with a fair processing statement, which informs them of the purposes for which their personal data will be used, the legal basis for that processing, and any disclosures that will be made regarding their data. A similar statement is provided to job applicants, employees, workers and consultants when they join TKH and CUB-at-TKH. For the avoidance of any doubt, the processing of staff and student personal data is necessary for the performance of our agreements with you. Personal data may also be processed where this is necessary for the TKH and CUB-at-TKH compliance with a legal obligation, a public task, the vital interests of a data subject, where consent has been obtained or where it is in our legitimate interests to do so.

In accordance with the normal and proper conduct of academic and business operations TKH and CUB-at-TKH hold personal data on prospective, current and former students, prospective, current and former employees; other business and academic contacts; and other individuals interested or connected with TKH and CUB-at-TKH.

Any employee or student who intends using personal data for purposes additional to those specifically set out in the fair processing statements referred to above, or who intends using personal data of individuals who are neither staff nor students, should seek advice from the TKH Legal Department at legal@tkh.edu.eg.

3. Training

It is the responsibility of line managers to ensure that staff have received appropriate training in data protection regularly. This includes temporary and casual staff. It is the responsibility of every member of staff to act in accordance with the training provided.

4. Sanctions

TKH and CUB at TKH are able to enact disciplinary procedures for staff and students in response to breaches of this Policy. In addition, some breaches the Legislation are likely to be criminal offenses which may result in prosecution of the individual responsible for the breach.

5. Third Party Disclosures

Information about you may be used and disclosed to other parties outside TKH and CUB-at-TKH as required and governed by the Legislation and the general rules of the Egyptian Laws.

6. Retention of data

TKH and the CUB-at-TKH will seek to ensure that they do not keep personal data in a form which permits the identification of the data subject for longer than needed for the purposes of which we originally collected it including for the purpose of satisfying any legal, accounting or reporting requirements and in accordance with any data retention policy which TKH and CUB-at-TKH may have in force from time to time.

7. Individuals Rights

Individuals have the right, under the Legislation, to:

- a) access the personal data which we hold about them and to receive a copy of the same;
- b) to be provided with details of the purposes for which we are processing the individuals' personal data;
- c) to be provided with the categories of personal data which we hold;
- d) to be provided with details of all recipients to whom the personal data has been disclosed;
- e) to be told how long it is intended their personal data will be held;
- f) to request rectification or erasure of their personal data or to restrict the processing of their personal data;
- g) know who provided their data if this was not the individual themselves; and
- h) know if their personal data is going to be subject to automated decision makings or profiling and the logic behind those automated processes;

All requests in relation to individual's rights are dealt with centrally by the TKH Legal Department, although you may be required to assist the TKH Legal Department in their handling of the request.

8. Security of Personal Data

TKH and CUB-at-TKH have, and will retain, appropriate technical and organisational measures to ensure the security of the personal data which we process. Guidance on security of personal data is provided by the Information Security Policy. Any processing of personal data which is not in conformance with the

above-mentioned guidance will be considered a breach of this Policy and will be subject to the sanctions set out above.

9. Your data

It is the responsibility of employees' and students' responsibility to ensure that the personal data which TKH and CUB-at-TKH hold about you is accurate and up to date. If you require any amendments to be made to any personal data which the TKH and CUB-at-TKH hold about you, you should use the portals and systems made available to you by TKH. In the event that you encounter any difficulties updating the data which TKH and CUB-at-TKH hold about you, you should notify the TKH Legal Department.

TKH and CUB-at-TKH cannot be held responsible for any errors unless the member of staff or student has informed TKH and CUB-at-TKH about them.

10. Personal Data Breach

A personal data breach is defined as being *"a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed"*. This is, therefore, wider than simply a loss of personal data and can include:

- unauthorised access;
- loss of mobile devices, laptop or paper copies;
- sending data to the wrong person;
- disclosure to third party; and
- the unauthorised alteration of data and the deletion of personal data.

In the event of a personal data breach of or of this Policy, it must be reported **immediately by the person that discovered the breach** to the IT Services email it.support@tkh.edu.eg

Unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons, TKH Legal Department will notify the same to the relevant authorities within 72 hours of becoming aware of the breach. Where any personal data breach is likely to result in a high degree of risk to the rights and freedoms of natural persons TKH and CUB-at-TKH, shall notify the relevant authorities and communicate that data breach to the individuals concerned without undue delay.

Further Information

For further information, contact TKH Legal Department at legal@tkh.edu.eg.

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Review Date: September 2020

*****Disclaimer:** The Knowledge Hub Universities reviews the policies on regular basis if needed for work flow and business purposes.

Version Log	Date	Signature of the President of TKH
Version 1 (V.1)		