



**African Leadership Academy**  
Developing the next generation of African leaders

## THE ALA DATA PRIVACY PHILOSOPHY

### OVERVIEW:

African Leadership Academy seeks enable lasting peace and shared prosperity in Africa by identifying, developing, and connecting leaders who will address Africa’s greatest challenges, achieve extraordinary social impact, and accelerate the continent’s growth trajectory. Our ability to further this mission depends on the collection, storage, and use (collectively, “processing”) of personal data. The processing of personal data is critical to the development of the ALA network – it enables program participants to be admitted and taught; staffulty to be recruited; alumni and network participants to be supported; funds to be secured and financial stability to be ensured; partners and other stakeholders to be engaged; and the impact of the organization to be assessed, communicated, and furthered.

The continued development of the ALA network also depends on the maintained trust of program applicants and participants, alumni, staffulty, donors, parents, and partners (“stakeholders”). ALA is a tight-knit community and powerful network that guides young leaders along their path to transformative impact in Africa. ALA is responsible for handling personal data of its stakeholders across a range of dimensions as part of supporting lifelong leadership development – spanning academics, careers, social engagement, health and wellness, and more. The uniquely personal and multifaceted relationship that exists between ALA and each of its stakeholders necessitates the handling of this data with the utmost care.

This philosophy statement seeks to provide reasonable guidelines and boundaries for the use of personal data in ALA’s furtherance of its mission while protecting the privacy and maintaining the trust of all stakeholders. The following principles guide ALA in its processing of personal data to further its mission:

### Lawfulness

- ALA protects the privacy of all stakeholders in line with the Protection of Personal Information Act (POPIA) and related South African legislation, General Data Protection Regulation (GDPR), and all other relevant legislation



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- ALA’s approach to data privacy reflects global leading practices and its commitment to good institutional governance<sup>1</sup>

## **Transparency:**

- ALA informs all stakeholders of the ways and the purposes for which it processes their personal data
- ALA only processes personal data in ways and for purposes that are consistent with our mission and in line with our data privacy policy

## **Respect for the dignity and rights of data subjects:**

- ALA respects the human dignity of all stakeholders and does not process personal data in ways that undermine that dignity
- ALA recognizes that it is the custodian of personal data owned by the data subject, and accordingly ensures that its processes give effect to all fundamental rights of data subjects, including the rights to access, correct, and delete their personal data
- ALA collects personal data through self-reporting wherever possible, subject to its legitimate interest in collection that most effectively allows it to further its mission
- ALA respects the preferences of stakeholders with respect to the receipt of communications, subject to its legitimate interest in communication that most effectively allows it to further its mission or fulfil contractual duties

## **Purpose limitation and data minimisation:**

- ALA deliberately identifies the purpose of the collection of personal data before processing, and does not engage in any processing inconsistent with that purpose
- ALA processes personal data only as much as necessary for its purpose
- ALA stores personal data only as long as is necessary for its purpose

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<sup>1</sup> See, e.g. “The Protection of Personal Information Act (POPI) in South African Schools”, *Independent Schools Association of Southern Africa*, 2015; , “POPIA and Schools”, *Michalsons*, 2018; “Data Protection: A Toolkit for Schools”, U.K. Department of Education, 2018; “Privacy is Paramount: Personal Data Protection in Africa”, *Deloitte*, 2017; Botha and Grobler, “A High-Level Comparison between the South African Protection of Personal Information Act and International Data Protection Laws”, 2017.



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## **Security and confidentiality:**

- ALA incorporates data privacy requirements into administrative procedures involving the processing of personal data, particularly in relation to major information systems (the concept of ‘privacy by design’)
- ALA does not disclose personal data to unauthorised persons, whether inside or outside the organization. Within the organization, access to any particular personal data is limited to individuals who need access to that data to carry out their duties. Except in the limited circumstances outlined in our data privacy policy, such as when necessary to fulfil legal or contractual obligations, personal data is not shared outside of the organization without explicit consent.
- All ALA stakeholders who access personal data receive appropriate training, including training on data privacy, before being granted access

## **Accountability**

- ALA has appointed a statutory Information Officer who is ultimately accountable for all processing of personal data within the organization
- Each ALA team is responsible for the creation, implementation, and monitoring of compliance measures consistent with this philosophy and the ALA Data Privacy Policy