



African Leadership Academy
Developing the next generation of African leaders

African Leadership Academy Data Privacy Policy

Introduction

African Leadership Academy (“ALA”) is committed to the privacy and security of personal data. Personal data includes any information that relates to an identifiable individual. This data privacy policy explains how we process the personal data of program applicants and participants, alumni, donors, staff, parents, and other partners (“stakeholders”).

The processing of personal data is critical to ALA’s ability to fulfill its mission. It is necessary for program participants to be admitted and taught; staff to be recruited; alumni and network participants to be supported; partners, donors, and other stakeholders to be engaged; and the impact of the organization to be assessed, communicated, and continually furthered. We are committed to maintaining your confidence and trust with respect to your privacy.

Our Principles

This policy seeks to provide a clear explanation of our approach to protecting your personal data. The following principles provide the foundation for that approach:

- We protect our stakeholder’s privacy in line with the Protection of Personal Information Act (POPIA) and related South African legislation, General Data Protection Regulation (GDPR), other relevant legislation, global leading practices, and our commitment to good institutional governance
- We are transparent about what data we are collecting about our stakeholders, how we are collecting it, and how and why we use it
- We respect the human dignity of all stakeholders and will not process personal data in a way that undermines that respect
- We recognize that we are the custodian of personal data belonging to our stakeholders, and ensure that our processes give effect to our stakeholders’ fundamental rights
- We hold ourselves accountable for the proper processing of our stakeholders’ personal data, and have policies and procedures in place to ensure that it is secure

Use of Personal Data

We use personal data for admissions processes, student and career services, fundraising, alumni and partner engagement, and human resources administration.



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We also use personal data for the purposes of operational reporting, measurement and evaluation, and sharing our impact story with the world, which enables us to expand the impact of our network. In these efforts, we use anonymised or pseudonymised data wherever possible.

With respect to all personal data we process, we identify its purpose before processing and do not engage in any processing inconsistent with that purpose.

Personal Data Collected

While the specific data we collect varies based on the nature of our relationship with the particular stakeholder, we primarily process the following kinds of personal data:

- Basic biographic/contact information – including names, home and business addresses, phone numbers, email addresses, and social media contact information (e.g., links to your social media presence on LinkedIn, Twitter, website or blog)
- Demographic information – including gender, birth date, photograph, language, and citizenship
- Family information – including the names of your parents, children, or other familial relationships, marital status, and the names of your spouse/partner
- Educational and employment information – including other education history, professional qualifications, company names, job titles, and industry information
- Student directory information obtained from ALA program records – including degrees or certificates earned, affiliations and clubs, and awards or honors
- Information about your use of ALA resources – including records of your personal interactions with us (e.g. correspondence, notes of meetings or conversations), programs and initiatives in which you have participated, and services that we have provided you
- Information about your participation in the ALA network – including your connections to other alumni, students, groups or networks, donors and partners; event attendance, organization affiliations, and committee participation
- Information about donors and prospective donors – including information regarding any donation which is made, ability to give, and indicators of your interest in giving
- Any additional information that is necessary for ALA to fulfil its duties, contractual or otherwise, to the stakeholder



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Sensitive Personal Data

- We do not seek to obtain the following categories of information from you: religious beliefs, sexual orientation, political opinions, or trade union status.
- We only process data related to race or ethnicity with your explicit consent (e.g., for the purposes of facilitating opportunities targeted to specific demographic groups) or when required to by law (e.g. for staffulty members, in order to comply with regulations of the South African Department of Employment and Labour).
- We only process your health data if you have:
 - Provided your express consent for us to do so at the start of your relationship with us (e.g., program participants, or their parents on their behalf, provide such consent at the time of enrollment in the Student Health Information Package), or
 - Provided health data directly to us so that we can make reasonable adjustments to improve the service we are able to offer you (e.g. to provide accessible seating or access at an event, meet your dietary requirements, or in the provision of disabled parking or other accommodations).
- Before seeking or accepting major donations we conduct due diligence, which might include reviewing publicly available personal data relating to the donor's criminal convictions and offences.
- We perform regular criminal background checks for all staffulty as a prerequisite for employment as part of our commitment to safeguarding our program participants

How We Collect Personal Data

General Data

You directly provide to us a significant portion of the personal data we collect through:

- your initial engagement with us (e.g., by submitting an application to participate in an ALA program or for an employment position at ALA),
- your direct participation in ALA programs (e.g., by enrolling in the diploma program, ALA Model African Union, Global Scholars Programs, Anzisha Prize, etc.) and ongoing interactions with us (e.g., by corresponding with ALA staffulty, or updating your information in the ACN portal),
- your registration to attend an event,



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- your submission of information in connection with your donation,
- your employment at ALA.

We also collect your information when you have provided us consent to do so (e.g., diploma program participants, who consent to the use of their name, image, and likeness in our marketing materials at the time of their enrollment).

In some cases, we may supplement the information that you provide to us directly with publicly available information, which we obtain from sources, including:

- Company and university websites
- Public records, including those related to property and donations
- Social media sites, such as LinkedIn

Core Personal Data

There is a select set of core personal data related to alumni that are necessary for ALA to collect to monitor and evaluate its success in fulfilling its mission. These are limited to:

- current and past residential locations,
- educational history, and
- employment history.

Where necessary to obtain and maintain the accuracy of these core personal data, we may supplement the data collection methods used for general data with collection of data that is available to ALA staff through social media or that we receive indirectly through your participation in ALA network activities. To collect these core personal data, we may use LinkedIn, Facebook, Twitter, and Instagram. We may also collect core data that has been provided to us indirectly (e.g., through your participation in alumni groups, your communication with an ALA staff member, your communication with another member of the ALA network, such as an alumni network connector). We only use these additional means to collect the core personal data categories defined above, and we do not use them for the collection of any other type of personal data that is not publicly available without your consent.

Sharing of Your Personal Data



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Internally

To perform the functions listed above, it may be necessary to share your personal data with staff who have a need to know (e.g. a member of our University Support team may share information regarding the career interests of an alumnus with a member of our Africa Career Networks team that is responsible for assisting the alumnus in internship placement).

Externally

Generally, when sharing data externally, we will share only anonymized or aggregated data that is not identifiable to any individual. Most commonly, we share anonymized or aggregated data to measure and evaluate our success in fulfilling our mission – e.g., when communicating to our stakeholders about the leading universities attended by ALA alumni, the rate of return to Africa by ALA Alumni and average time taken to do so, the proportion of alumni engaged in Africa (whether by direct return or involvement in African projects from abroad), the degree to which alumni ventures span the spectrum of sectors identified as Africa's grand challenges and opportunities, the career placements secured through ALA's Careers and Internships program, or the prizes collected by Anzisha fellows.

In the following limited instances, we may share your personal data externally:

- We may share your personal data with your express consent. For example, we share student academic records with universities upon student request.
- We may share your personal data with third parties performing services under contract with us who have a need to know, including but not limited to monitoring and evaluation experts performing donor-mandated grant evaluations. We only use service providers that have contractually agreed to process your data in line with this policy.
- We are proud of our stakeholders and will publish directory information (i.e., names, photos, and program participation years) from time to time either in our marketing materials, on our web site, or on ALA-affiliated social media pages. In cases where we seek to share non-directory or non-public information about our stakeholders through our publications or on our websites or social media pages (e.g., in case studies or other profiles), we will gain the stakeholder's express consent. Wherever possible, we obtain this express consent at the start of your relationship with us (e.g., diploma program participants' consent to ALA's use of their name and likeness in our materials, publications and websites prior to enrollment).



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- When you participate in events or programming that is open to broader audiences, we may provide personal information to, and otherwise use personal information, to facilitate contact with other participants, unless you have expressly requested that we not publish that information.
- When you make a gift to ALA, we may publish your name as part of a donor list, unless you have expressly asked to remain anonymous.
- In certain instances, we may be required to share your personal information to meet legal obligations (e.g., in order to comply with regulations from the South African Department of Education or Department of Employment and Labour).

How We Keep Your Personal Data Secure

We always process your personal data securely, minimize its collection, and limit its use to the purposes for which it was collected. We use administrative, technological, and physical security measures to protect your personal data, including role-based access requirements and other safeguards. All ALA faculty and staff that process personal data receive training on appropriate processing of your personal data and are individually responsible for complying with data privacy legislation, this policy and any other policy, guidance, or procedures introduced by ALA to comply with data privacy legislation.

How Long We Keep Your Personal Data

ALA considers our relationship with program participants, parents, alumni, donors, staff, and other partners to be life-long. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. We store personal data only as long as necessary for its purpose. We regularly evaluate the continued retention of each of the types of information that we collect to ensure consistency with this policy. Once personal data is no longer necessary for the purpose for which it was collected, it is deleted or anonymized.

Upon a request to delete your information, we will maintain a limited subset of personal data to ensure we do not contact you inadvertently in the future, as well as any information necessary for ALA archival or legal purposes, such as academic and employment records.

Legal Basis for Processing



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ALA will process personal data in the pursuit of the various legitimate interests set out above in this privacy policy and will rely on these legitimate interests as the legal basis for processing where these interests are not overridden by the interests and rights or freedoms of the data subjects concerned.

This may not be the only lawful basis on which ALA may process personal data; as such, ALA may sometimes process data on an alternative legal basis, such as where a data subject has given us consent to do so or where such processing is necessary to perform a contract between ALA and a data subject.

Individual Access and Control

You have the right to access or amend your personal data; request that ALA restrict its processing of your personal data; object or unsubscribe to communications or direct marketing; or ask for the transfer of your personal data electronically to a third party. You have the right to withdraw your consent to our processing of your personal data at any time by notifying us at the contact information below. You also have the right to the erasure of your information, provided there is no legitimate reason for ALA to continue to process or retain the information.

These rights may be limited in various ways. For example, we may continue to process your personal data after you have withdrawn consent and requested that we delete your personal data, if we have a legal basis to do so i.e., to comply with an independent legal obligation, if we still need the data for the lawful purposes for which we obtained the data, or if it is necessary to keep our services and operations safe and secure.

Further Information

Our Information Officer is responsible for monitoring compliance with relevant legislation related to personal data protection and can be contacted at kmorris@aficanleadershipacademy.org. Please contact us if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes.

We will publish on our website any changes we make to this privacy policy and notify you by other communication channels where appropriate.