



AFRICAN INSTITUTE OF TRAINING & DEVELOPMENT (AITD) LTD

WEBSITE PRIVACY NOTICE

1. Introduction

- 1.1 This website is owned by AFRICAN INSTITUTE OF TRAINING & DEVELOPMENT (AITD) Ltd (hereafter “**AITD**”) and is operated, hosted and maintained by AITD website developer service provider **iFox Code Ltd**.
- 1.2 We are committed to safeguarding the privacy of our [website visitors, physical site visitors, service users, prospects, clients, service providers and their representatives].
- 1.3 As a result, we would like to inform you regarding the way we would use your personal data, as is required by the European Union General Data Protection Regulation (hereafter the “**GDPR**”). We recommend you read this Privacy Notice so that you understand our approach towards the use of your personal data.
- 1.4 Our Privacy Notice sets out the types of personal data we collect, how we collect and process that data, who we may share this information with and the rights you have in this respect.
- 1.5 This notice applies where we are acting as a data controller with respect to the personal data of our [website visitors, physical site visitors, service users, prospects, clients, service providers and their representatives], among others. As data controller, we determine the purposes and means of the processing of that personal data. We also comply with our obligations as a data processor under the GDPR.
- 1.6 By using our website, you acknowledge that you have read and understood the terms of this Privacy Notice.
- 1.7 In this notice, "we", "us" and "our" refer to AITD.

2. Who we are

- 2.1 We are registered in Rwanda under registration number 111863694, and our registered office is at Nyarugenge, Nyarugenge, Umujiyi wa Kigali, Rwanda.
- 2.2 Our principal place of business is at AITD Education, BP. 1600, Kigali, Rwanda.
- 2.3 AITD is an International Compliance Association (ICA) accredited training partner to offer a range of continuing professional development courses in-house and online to meet the evolving needs of skilled workforce of the current dynamic business environment.

3. Personal data we may collect about you

- 3.1 Personal data is any data from which you can be identified and which relates to you.
- 3.2 The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.
- 3.3 We may collect your personal data in the following ways:
- (a) When you give it to us **directly** for e.g. you use any of our services, you provide or offer to provide services to us, you correspond with us and provide us with your information, you visit our premises or you create an account to follow our online courses.
 - (b) When we obtain it **indirectly** for e.g. information is shared with us by third parties. In such a case, the third party must confirm that you have consented to the disclosure of your personal data to us.
 - (c) When it is available **publicly** for e.g. depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as Facebook or LinkedIn).
 - (d) When you browse and/or interact on our website.
- 3.4 The types of personal data that are collected and processed may include:

| Categories of Personal Data | Details |
|---------------------------------|--|
| Contact details | First name, surname, Date of birth, Residential address, email address, Recovery email address office phone, cell phone, fax number. |
| Individual details | Sex (male/female), Country of residence, Date of Birth, language, education. |
| National identification details | Identification numbers issued by government bodies or agencies such as your passport number, identity card number and driving license number. |
| Financial information | Financial history and well-being, pay details, pension details, tax details, bank details. |
| IT information | Information required to provide access to AITD's IT systems and networks such as login information (username, user ID and password), IP addresses, browser type and version, access time and length of access, page views, user activity and website usage in log files. |

| Categories of Personal Data | Details |
|-------------------------------|---|
| Physical security information | Information recorded in AITD's visitors' logbook (reason for visit, organization name, identification measures used, date and time of visit), CCTV footage. |
| Social Media Links | LinkedIn, Facebook, Twitter |

4. Cookies

We use cookies on our website. Please refer to our Cookie Policy, available at <https://aitd.education/pdf/cookie-policy.pdf> which covers in details the aspects of cookie usage and the purposes for which we use cookies.

5. How we use your personal data

- 5.1 AITD will only use your personal data for the purposes for which it was collected or agreed with you. We will not use your personal data for any automated individual decision making which will have a significant impact on you.
- 5.2 We have set out below the legal basis of processing for each purpose. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data.

| Purpose of processing | Legal basis |
|---|---|
| For the purposes of marketing goods and/or services which may be of interest to you (including third party suppliers of goods and services identified on our website) | Consent |
| For the purposes of direct marketing with our business contacts/existing customers such as sending emails and text messages, collecting contact details from business cards, providing similar products or services in the context of a customer relationship | Legitimate interests, namely promoting our business and communicating marketing messages and offers to our business contacts and existing customers |

| | |
|---|---|
| For the purposes of subscribing to our email notifications or newsletters and offering you the opportunity to take part in competitions or promotions | Consent |
| For the purposes of offering, supplying and selling relevant goods and/or services to you | Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract Legitimate interests, namely the proper administration of services. |
| For invoicing purposes | Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract |
| For the purpose of analysing the use of our website and services | Consent OR Legitimate interests, namely of monitoring and improving our website and services |
| For the purpose of monitoring compliance with our policies and standards | Legitimate interests, namely of monitoring and improving our website, business and services |
| For the purposes of registration of users to access our services and enabling use our website | Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract |
| For the purposes of ensuring the security of our website and services and maintaining back-ups of our databases | Legitimate interests, namely the proper administration of our website and business |
| For the purposes of managing our relationships with customers, communicating with customers and keeping records of those communications | Legitimate interests, namely for the proper management of our customer relationships |
| For the purposes of confirming and verifying your identify when you request to access, rectify, restrict or delete the information we hold on you | For compliance with a legal obligation to which we are subject to, that is, to verify the identity of a data subject who requests access |

| | |
|--|--|
| <p>For the purposes of replying to any requests, complaints, comment or enquiries you submit to us regarding our services and notifying you about changes to our service</p> | <p>Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract</p> <p>Legitimate interests namely for proper administration of our business and communication with users.</p> |
| <p>For the purpose of providing maintenance and support services</p> | <p>Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract</p> |
| <p>For collecting and recovering money or additional charges owed to us</p> | <p>Legitimate interests, namely to recover debts due to us</p> |
| <p>Processing CCTV footage captured on our premises for the purposes of:</p> <ul style="list-style-type: none"> - protecting our premises and property, - protecting your personal safety when you are on our premises, - identifying any misconduct or disciplinary infringements in our compound, - assisting in providing evidence for such misconduct, - for investigating, detecting or preventing crime, and - for apprehending and prosecuting offenders. | <p>Legitimate interests of ensuring physical security and proper conduct on our premises.</p> |
| <p>For the purposes of conducting market or customer satisfaction research, for statistical analysis, or for analysing the effectiveness of our advertisements, competitions and promotions</p> | <p>Legitimate interests, namely the proper administration of our website and business</p> |

5.3 In addition to the above-mentioned specific purposes for which we may process your personal data, we may also process any of your personal data where such processing is necessary for compliance with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

6. Disclosure of personal data

6.1 We may need to share your personal data with third parties which assist us in fulfilling our responsibilities regarding our business relationship with you and for the purposes listed above. AITD may disclose your personal data to the following third parties:

- a) We may disclose your personal data to another member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this notice. These include:
 - JurisTax Holdings Ltd, Juristax Rwanda Ltd, Juristax Mauritius which offer support services such as finance, IT, administration, amongst others.

- b) We may also make certain personal data available to third party service providers and agents who provide services to us (such as payment services providers, marketing companies, AITD website developer service provider). When we share with these third parties, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data. These include:
 - Bank of Kigali: Payment Service Provider
 - CapCairn Lifestyle: Marketing Company
 - iFOX Code Ltd: AITD website developer service provider

- c) We may also be required to disclose your personal data to other third parties such as lawyers, bankers, consultants, insurers, auditors as well as public and government authorities for purposes mentioned in Section 5 or where:
 - We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
 - We believe it is necessary to protect our rights;
 - We need to protect the rights, property or personal safety of any member of the public or a customer of our company or the interests of our company; or
 - You have given your consent.

6.2 We require our service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed. We have written agreements in place with our processors to ensure that they comply with these privacy terms.

7. International transfers

7.1 We may transfer personal data outside Rwanda as may be necessary for the purposes mentioned above. If we transfer your personal data to other countries, we will ensure that there are appropriate safeguards in place with regard to the protection of your personal data.

7.2 Those transfers would always be made in compliance with the GDPR. Data transfers do not change any of our commitments to safeguard your privacy and your personal data remains subject to existing confidentiality obligations.

7.3 If you would like further details on the transfer of your personal data outside Rwanda, please contact our Group Data Protection Officer by referring to Section 11.

8. Personal data security

8.1 We are legally obliged to provide adequate protection for the personal data we hold. We have put in place appropriate security measures to prevent your personal data from being subject to any accidental or unlawful destruction, loss, alteration, and any unauthorised disclosure or access.

8.2 We have also put in place procedures to deal with any suspected data security breach and will notify you and the authority in charge of data protection and privacy of a suspected breach where we are legally required to do so.

8.3 We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal data is secure.

8.4 Our security policies and procedures cover:

- Access to personal data
- Encryption
- Computer and network security
- Backup of data
- Incident management
- Use and misuse of IT assets

- Physical security
- Protection of physical records

8.5 When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal data that we remain responsible for is kept secure.

8.6 We will ensure that anyone to whom we pass your personal data agrees to treat your data with the same level of protection as we are obliged to.

9. Your data protection rights

Under the GDPR, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

9.1 Your right to erasure of your personal data

You have the right to ask us to delete your personal data in certain circumstances:

- When we no longer need your personal data;
- If you initially consented to the use of your personal data, but have now withdrawn your consent;
- If you have objected to us using your personal data, and your interests outweigh ours;
- If we have collected or used your personal data unlawfully; and
- If we have a legal obligation to erase your data.

Where we collect personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. Upon the determined expiry date, we will securely destroy your personal data. Retention periods are indicated in Annex A's Records Retention and Disposal Schedule. When we delete data from our servers, no residual copies remain on our servers. Data from our backup tapes are also deleted depending on the next scheduled backup overwrite which may be on a weekly, monthly or yearly basis in accordance with its configuration.

9.2 Your right of access to your personal data

You have the right to request a copy of the personal data we hold about you. To do this, simply contact our Group Data Protection Officer (refer to Section 11) and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.3 Your right to rectification of your personal data

You have the right to ask us to update or correct your personal data if you think it is inaccurate or incomplete. We will take all reasonable steps to confirm your identity before making changes to personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your personal data accurate and up-to-date by notifying us of any changes we need to be aware of.

9.4 Your right to restriction of processing

You have the right to ask us to limit how we use your data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact our Group Data Protection Officer (refer to Section 11), say what data you want restricted and state your reasons. You may request us to restrict processing of your personal data in the following circumstances:

- If you have contested the accuracy of your personal data, for a period to enable us to verify the accuracy of the data;
- If you have made an objection to the use of your personal data;
- If we have processed your personal data unlawfully but you do want it deleted;
- If we no longer need your personal data but you want us to keep it in order to create, exercise or defend legal claims.

9.5 Your right to object to processing

You also have the right to object to us processing your personal data where your data is being used:

- For a task carried out in the public interest;
- For our legitimate interests;
- For scientific or historical research, or statistical purposes; or
- For direct marketing.

[Among the above, we currently process personal data for our legitimate interests only]. You should contact our Group Data Protection Officer (refer to Section 11) to inform that you are objecting to any more processing of your personal data and state in your objection why you believe we should stop using your data in this way. Unless we believe we have strong legitimate reasons to continue using your data in spite of your objections, we will stop processing your data as per the objection raised.

9.6 Your right to data portability

The right to data portability allows you to ask for transfer of your personal data from one organisation to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to information you have given us by

contacting our Group Data Protection Officer (refer to Section 11). We will ensure that your data is provided in a way that is accessible and machine-readable.

9.7 Your right to withdraw consent

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact our Group Data Protection Officer (refer to Section 11).

10. Changes to this privacy notice

We keep our privacy notice under regular review. We reserve the right to change our privacy notice at any time thus we encourage you to periodically review this notice to be informed of how we are using and protecting your personal data. We will notify you of significant changes by email or through automatic pop-ups on our website. This version was last updated on 22 April 2021.

11. Contact details

11.1 The primary point of contact for questions relating to this privacy notice, including any requests to exercise your legal rights, is our Group Data Protection Officer who can be contacted:

- (a) using our website contact form;
- (b) by telephone, on [the contact number published on our website from time to time]; or
- (c) by email, at [contact@aitd.education].

11.2 If you believe we have not handled your request in an appropriate manner, you have the right to complain to the authority in charge of data protection and privacy.

ANNEX A: RECORDS RETENTION AND DISPOSAL SCHEDULE

As a general rule, the maximum retention period is 10 years.

The table below sets specific retention requirements:

| Categories of Personal Data | Purpose of processing | Retention period |
|--------------------------------------|---|---|
| Contact details | Creation of learners account for online courses | 10 years after deletion of account on our website |
| | Invoicing to learners | 3 years after last transaction |
| | Data Subject Access Requests | 2 years after the Data Subject Access Request has been closed |
| IT information | User/ customer registration | 10 years after deletion of account on our website |
| Financial information | Invoicing to learners | 3 years after last transaction |
| Physical security information | Security/ Identifying disciplinary infringement/ Investigation, detection & prevention of crime | 1 month |