

LUPANE STATE UNIVERSITY (LSU) PRIVACY NOTICE

Last updated: 1 July 2025

1. Introduction

Lupane State University (“LSU”, “we”, “us”, or “our”) is committed to protecting the privacy, confidentiality, and security of personal data in accordance with the **Cyber and Data Protection Act [Chapter 12:07] (CDPA)** and the **Cybersecurity and Data Protection Regulations (CDPR), SI 155 of 2024** of Zimbabwe.

This Privacy Notice explains how we collect, use, store, share, and protect your personal data when you interact with LSU in any capacity — as a student, employee, applicant, visitor, contractor, or through our websites and systems.

2. Scope

This Privacy Notice applies to all personal data processed by LSU through:

- Academic and administrative processes
 - Digital platforms (e.g. Edurole, Moodle, KOHA)
 - LSU websites and online services
 - Email and telecommunication systems
 - Physical security systems (e.g. visitor logs, access controls)
 - HR and recruitment systems
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3. Legal Basis for Processing

LSU processes personal data based on one or more of the following legal grounds as stipulated in the CDPA:

- Performance of a contract (e.g. employment, enrolment)
 - Compliance with a legal obligation
 - Protection of vital interests
 - Performance of a task carried out in the public interest
 - Legitimate interests pursued by LSU or a third party
 - Consent (where required)
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4. Categories of Personal Data Collected

We may collect and process the following categories of personal data:

a. Identity Data

- Name, date of birth, gender, national ID, passport number, EC number (for employees)

b. Contact Data

- Physical address, email address, phone number, next of kin

c. Academic and Professional Data

- Educational history, transcripts, qualifications, staff development records, job applications

d. Financial Data

- Bank details, tuition/payment records, salary information, NSSA and ZIMRA numbers

e. ICT Usage Data

- LSU email usage, MOODLE and EduRole activity logs, internet browsing logs, device identifiers

f. Security Data

- Visitor logs, ID card access logs, CCTV footage (where installed), disciplinary records

g. Special Category Data

- Health or disability information (for student welfare, HR, or accommodation), biometric data (if applicable), religion (only if necessary and consented)

5. Purposes for Processing Personal Data

LSU processes personal data for the following purposes:

- Student admissions, registration, teaching, examinations, graduation
- Employment, payroll, benefits administration, and performance management
- Library and ICT services provisioning
- Security and safety management
- Research, planning, and institutional development
- Communication with stakeholders
- Statutory reporting to entities like MoHTEISTD, ZIMRA, ZIMSEC, POTRAZ, NSSA, etc.
- Compliance with data controller obligations under the CDPA

6. Data Sharing and Disclosure

LSU does **not sell** your data. We may share personal data with:

- Government agencies and regulators (e.g. MoHTEISTD, ZIMRA, ZIMSEC, NSSA, POTRAZ)
- Service providers under strict contractual obligations (e.g. cloud service providers, IT maintenance)

- Educational partners (e.g. external examiners, funding agencies, collaboration partners)
- Law enforcement agencies when required by law
- Accrediting and ranking bodies, where anonymized or aggregated data is insufficient

All data disclosures are governed by applicable laws and LSU's internal Data Sharing Agreements.

7. Data Security

LSU implements appropriate **technical and organizational measures** to safeguard your personal data, including:

- Access control and authentication mechanisms
 - Firewalls and antivirus systems
 - Data encryption where applicable
 - Regular system audits and monitoring
 - Security awareness training for staff
 - Cyber incident response procedures
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8. Data Retention

LSU retains personal data only for as long as necessary to fulfill the purposes outlined in this Notice or to comply with legal obligations. Data retention schedules are maintained in accordance with institutional policy and CDPA regulations.

9. Data Subject Rights

Under the CDPA, you have the following rights regarding your personal data:

- **Right to be informed** – about the collection and use of your personal data
- **Right of access** – to your personal data held by LSU
- **Right to rectification** – to correct inaccurate or incomplete data
- **Right to erasure** – to have your data deleted, under certain conditions
- **Right to restriction of processing**
- **Right to object** – to processing based on legitimate interests or public interest
- **Right not to be subject to automated decision-making** without human involvement

To exercise your rights, contact the LSU Data Protection Officer (see Section 12 below).

10. Cross-Border Data Transfers

Where personal data is transferred outside Zimbabwe, LSU ensures that:

- The destination country has adequate data protection laws, or
 - Appropriate safeguards are in place (e.g. contractual clauses), and
 - Data subject rights continue to be protected
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11. Cookies and Online Tracking

LSU websites may use cookies and other tracking technologies to:

- Enable website functionality
- Analyze traffic and usage patterns
- Improve user experience

You can manage your cookie preferences through your browser settings.

12. Contact Details

Data Protection Officer (DPO)

Lupane State University
ICTS Department
Private Bag 170, Lupane, Zimbabwe
☎ Tel: +263 (81) 285 6969
✉ Email: dpo@lsu.ac.zw

13. Updates to this Notice

This Privacy Notice may be updated periodically to reflect changes in law, technology, or LSU operations. All changes will be published on the LSU website. We encourage you to check regularly for updates.

