

# Privacy Policy

**Nasarawa State University, Keffi**

**Effective Date:** 21/04/2021

**Version:** 2.0

## 1. Introduction

Nasarawa State University, Keffi (“NSUK”, “University”, “we”, “our”, or “us”) is committed to protecting the privacy and security of personal information collected through our digital platforms. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our systems.

## 2. Information We Collect

### 2.1 Personal Information

We collect information that identifies you, including:

- Full name and contact details
- Student/Staff ID numbers
- Academic records and transcripts
- Employment and payroll information
- Financial aid and payment data
- Login credentials and access logs

### 2.2 Biometric Data

Through our Biometric Automation System, we collect:

- Fingerprint data
- Facial recognition data
- Iris scan data (where applicable)
- Attendance and access records

### 2.3 Automatically Collected Information

Our systems automatically collect:

- IP addresses
- Browser type and version
- Device information
- Access times and dates
- Pages viewed and actions taken
- System performance data

### 3. How We Use Your Information

We use collected information to:

- Provide and maintain our services
- Process academic records and transcripts
- Manage employment and payroll
- Administer financial aid and payments
- Ensure campus security and access control
- Communicate important university information
- Comply with legal and regulatory requirements
- Improve our services and user experience
- Conduct institutional research and reporting

### 4. Legal Basis for Processing

We process your personal data based on:

- **Consent:** For biometric data and optional services
- **Contract:** To fulfill our educational and employment agreements
- **Legal Obligation:** To comply with educational regulations and laws
- **Legitimate Interests:** For security, fraud prevention, and institutional operations

### 5. Data Security Measures

We implement appropriate technical and organizational measures:

- Encryption of sensitive data in transit and at rest
- Role-based access controls
- Regular security audits and assessments
- Secure data centers with physical access controls
- Employee training on data protection
- Incident response procedures
- Regular backups and disaster recovery plans

### 6. Data Sharing and Disclosure

#### 6.1 Within the University

We share information internally on a need-to-know basis for:

- Academic administration
- Student services
- Human resources functions
- Financial operations
- Security and safety

## 6.2 External Sharing

We may share information with:

- Government regulatory bodies (as required by law)
- External auditors and accreditation bodies
- Partner institutions (with your consent)
- Service providers under confidentiality agreements
- Law enforcement (when legally required)

## 6.3 We Do NOT:

- Sell your personal information
- Share data for marketing purposes
- Transfer data without appropriate safeguards

## 7. Data Retention

We retain personal information for:

- **Student Records:** Permanently, as required by educational regulations
- **Employment Records:** As per Nigerian labor laws
- **Financial Records:** 7 years after last transaction
- **Biometric Data:** Duration of enrollment/employment plus 1 year
- **System Logs:** 1 year for security purposes
- **Email Communications:** 3 years

## 8. Your Rights

You have the right to:

- **Access:** Request copies of your personal data
- **Correction:** Request corrections to inaccurate data
- **Deletion:** Request deletion (subject to legal retention requirements)
- **Restriction:** Limit processing of your data
- **Portability:** Receive your data in a structured format
- **Objection:** Object to certain types of processing
- **Consent Withdrawal:** Withdraw consent where processing is consent-based

## 9. Biometric Data Special Provisions

### 9.1 Consent and Purpose

- Biometric data is collected only with explicit consent
- Used solely for identity verification and attendance
- Not shared with third parties except as required by law

## 9.2 Security Measures

- Biometric templates stored, not raw images
- Encrypted storage with restricted access
- Regular audits of biometric system usage

## 9.3 Your Rights

- Opt-out alternatives available upon request
- Right to deletion upon leaving the university

# 10. System Monitoring

## 10.1 Monitoring Activities

We monitor systems for:

- Security threats and unauthorized access
- System performance and reliability
- Compliance with Terms of Service
- Investigation of policy violations

## 10.2 Transparency

- Monitoring is conducted in accordance with this policy
- Logs are accessed only by authorized personnel
- Retention periods apply to monitoring data

# 11. International Data Transfers

If we transfer data internationally, we ensure:

- Appropriate safeguards are in place
- Receiving countries provide adequate protection
- Transfer agreements comply with applicable laws

# 12. Children's Privacy

Our systems are not intended for children under 16. We do not knowingly collect data from children without parental consent.

# 13. Updates to This Policy

We may update this Privacy Policy periodically. We will notify you of material changes via:

- Email notifications
- Portal announcements
- Website updates

## 14. Data Protection Officer

For privacy-related inquiries, contact our Data Protection Officer:

### **Data Protection Office**

Nasarawa State University, Keffi

Email: dpo@nsuk.edu.ng

Phone: .....

## 15. Complaints

If you're unsatisfied with our handling of your personal data, you may:

1. Contact our Data Protection Officer
2. File a complaint with the relevant supervisory authority

## 16. Cookie Policy

Our web-based systems use cookies for:

- Session management
- User preferences
- Analytics (anonymized)

You can control cookies through your browser settings.

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**Last Updated:** 29/05/2025

By using our systems, you acknowledge that you have read and understood this Privacy Policy.