



ZIMBABWE EZEKIEL GUTI UNIVERSITY (ZEGU)

DATA PRIVACY POLICY

Document Type	Policy	
Document Name	Data Privacy Policy	
Document Control Number	Data Protection Office/Policy/01/2025	
Date recommended	04 February 2026	
Review Date	3 years	
Responsibility for Review	Data Protection Officer	
Recommended by UQAC		
Approved by ICT Strategic Council Committee Chairperson	Signature 	Date 29/04/2026

1. Introduction

Zimbabwe Ezekiel Guti University (ZEGU) is committed to protecting the privacy and security of the personal data that the University collects, processes, and stores. This Data Privacy Policy outlines how ZEGU collects, uses, discloses, and safeguards personal information in compliance with applicable data protection laws, including Zimbabwe's Cyber and Data Protection Act (CDPA) [Chapter 12:07], and relevant international standards.

2. Purpose

The purpose of this Data Privacy Policy is to ensure that ZEGU manages personal data responsibly and transparently, respecting the rights of data subjects including students, staff, faculty, alumni, and other stakeholders.

3. Scope

This policy applies to all personal data processed by ZEGU, whether collected digitally, on paper, or by other means. It covers the data of all data

subjects, including, but not limited to, students, employees, contractors, visitors, and suppliers.

4. Definitions

- 4.1** Data Controller: ZEGU as the entity determining the purpose and means of processing personal data.
- 4.2** Data Processor: Any person or organisation processing personal data on behalf of ZEGU.
- 4.3** Data Subject: The individual whose personal data is processed.
- 4.4** Personal Data: Any information relating to an identified or identifiable individual.
- 4.5** Processing: Any operation or set of operations performed on personal data including collection, storage, use, disclosure, or deletion.

5. Objectives

The main objective of this Data Privacy Policy is to inform data subjects how ZEGU collects, uses, discloses, and protects their personal data, and to ensure that their privacy rights are respected.

6. Data Collection

ZEGU collects personal data necessary for the purposes of education delivery, administration, employment, research, alumni relations, and other legitimate university functions. This includes:

- 6.1** Identification details (Full name, national ID number, Passport number, date of birth)
- 6.2** Demographic data (gender, age, marital status)
- 6.3** Contact details (physical address, phone number, email address)
- 6.4** Academic records and transcripts
- 6.5** Financial information (bank account number, fees, proof of payments)
- 6.6** Multimedia data where relevant
- 6.7** Employment records

- 6.8 Health information where relevant
- 6.9 Any other data voluntarily provided

7. Lawful Basis for Processing

ZEGU processes personal data only where there is a lawful basis including:

- 7.1 Consent of the data subject
- 7.2 Performance of a contract
- 7.3 Compliance with legal obligations
- 7.4 Protection of vital interests
- 7.5 Legitimate interests pursued by ZEGU or a third party to whom the data is disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.
- 7.6 Public Interest, where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in ZEGU, or a third party to whom the data is disclosed.

8. Data Use and Disclosure

Personal data is used strictly for the purposes for which it was collected. ZEGU may share data with:

- 8.1 Relevant university departments and staff
- 8.2 Government agencies and regulatory authorities as required by law
- 8.3 Partner institutions for academic and research collaboration
- 8.4 Service providers and contractors bound by confidentiality
- 8.5 Other parties with explicit consent from the data subject.

9. Data Security

The University implements appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or destruction. These include:

- 9.1 Access controls and authentication
- 9.2 Data encryption where applicable

- 9.3 Regular staff training on data protection
- 9.4 Secure physical storage and disposal of records
- 9.5 ZEGU Code of Conduct
- 9.6 ZEGU ICT Policy and Procedures.

10. Data Retention

Personal data will be retained only for as long as necessary to fulfill the purposes it was collected for, including legal and regulatory requirements. When no longer required, data will be securely deleted or anonymised.

11. Rights of Data Subjects

Data subjects have the right to:

- 11.1 Access their personal data held by ZEGU
- 11.2 Request correction of inaccurate or incomplete data
- 11.3 Withdraw consent where processing is based on consent
- 11.4 Request data deletion or restriction of processing where applicable
- 11.5 Object to processing based on legitimate interests
- 11.6 Lodge complaints with the University's Data Protection Officer (DPO) or relevant regulatory body
- 11.7 To exercise any of their rights under the Cyber and Data Protection Act through the DPO.

12. Related Documents

- 12.1 Cyber and Data Protection Act [Chapter 12:07] of Zimbabwe
- 12.2 Cyber and Data Protection Regulations (SI 155 of 2024)
- 12.3 The Constitution of Zimbabwe (Section 57) (Right to privacy)
- 12.4 ZEGU ICT Policy and Procedures manual