



KABARAK UNIVERSITY

DATA SUBJECT RIGHTS REQUEST PROCEDURE

1. Introduction

Kabarak University is committed to protecting the privacy and personal data of all individuals in accordance with the Kenya Data Protection Act, 2019. This procedure details how individuals (data subjects) can exercise their rights regarding their personal data held by the university. The process is designed to be handled legally, securely, and efficiently.

2. Receipt and Logging of Request

2.1 Submission: A data subject may submit a request in writing. While a self-service portal is available, for complex requests or in cases where the portal is not sufficient, requests should be made using the relevant Data Subject Rights Form and sent to the Data Management Officer at dpo@kabarak.ac.ke.

2.2 Logging: Upon receipt, the request is officially logged. This record includes the date of submission and is used to ensure all requests are addressed within the statutory 21-day deadline.

2.3 Acknowledgement: The data subject will receive an acknowledgement that their request has been received and is being processed.

3. Validation and Processing

3.1 Identity Verification: To prevent unauthorized disclosure of personal data, the university will take reasonable steps to verify the identity of the requester. This may include requesting a copy of a National Identity card, Employee ID card, Student ID card, or passport. Requests from individuals who cannot provide satisfactory identification will be rejected.

3.2 Clarification: If a request is broad or unclear (e.g., "all the data you hold about me"), the university may ask the data subject to specify the information required. The 21-day processing period will be paused until this clarification is received.

3.3 Data Collection: The Data Management Officer (DPO) will coordinate with relevant departments to gather all pertinent personal data.

3.4 Review and Redaction: The collected data will be reviewed. Any personal information belonging to third parties will be redacted to protect their privacy, as per legal requirements.

4. Response and Fulfillment

4.1 Response Time: The university will respond to and fulfill all valid requests within 21 days of receipt.

- 4.2 Granting Access:** The personal data will be provided in a clear, accessible format. Access to the requested rights will be granted with clearance from the data custodians.
- 4.3 Explanation of Exemptions:** If any data is withheld due to a legal exemption under the Data Protection Act, 2019, the university will provide the specific reason for doing so in its response.
- 4.4 Fees:** Fees may be charged only if a request is deemed manifestly unfounded or excessive, in line with the provisions of the Act.

end
