



PD17 - Privacy Notice

Summary	The aims of this policy are to: Set out the expectations, procedures and protocols in relation to how personal data is received, managed and processed at Holmes Institute Botswana (HIB). Assist to ensure HIB's adherence and compliance to privacy and data protection legislation. Minimise risk relevant in relation to personal data breaches and other breaches of data protection legislation.		
Policy Owner	Director of Risk and Compliance as Data Protection Officer (DPO)		
Policy Sponsor	Board of Directors		
Policy applies to	All staff at HIB		
Equality impact assessment completed	This policy, and the privacy and data protection legislative framework, acknowledge that personal data relating to individuals with protected characteristics needs to be carefully managed and controlled. This data, considered to be Special Category Personal Data, is likely to be more sensitive, or private, and therefore likely to cause more damage or distress if compromised. It is therefore given additional protection in data protection legislation and in this policy.		
Relevant Legislation and Policies	Botswana Data Protection Act (Act No. 18 of 2024)		
Version	1.1		
Approved by	Board of Directors	Approval date	1 June 2026
Date of implementation	1 June 2026	Date of next formal review	3 years following approval date.



1. INTRODUCTION

- 1.1 This Privacy Notice concerns the processing of personal data of past, present and prospective students of Holmes Institute Botswana (“HIB”, “us” or “we”).
- 1.2 The Privacy Notice explains how HIB collects, uses and shares your personal data, and your rights in relation to the personal data we hold on you.
- 1.3 Personal data only includes information relating to natural persons who:
 - can be identified or who are identifiable, directly from the information in question; or
 - who can be indirectly identified from that information in combination with other information.
- 1.4 HIB is the Data Controller of your personal data and is subject to data protection legislation in Botswana.
- 1.5 Further details of how we handle data and the relevant complaints process with regards to data protection is outlined in our Privacy and Data Protection Policy.
- 1.6 For completeness, the Botswana Data Protection Act, Act No. 18 of 2024, provides for the Information and Data Protection Commission as the national authority responsible for overseeing and enforcing Botswana’s data protection framework. Where applicable, individuals may also have rights to raise data protection concerns or complaints with the Information and Data Protection Commission.

2. HOW YOUR DATA IS COLLECTED

- 2.1 We may collect your personal data in a number of ways, for example:
 - from the information you provide to us when you interact with us before you apply to start your course, for example when you express an interest in studying at HIB.
 - when you apply to study at HIB and complete application forms via our website, or through any other established admissions process, and when you complete other admissions and visa compliance processes and procedures
 - when you communicate with us by telephone, email or via our website, for example in order to make enquiries or other matters.
 - as you interact with us during your time as a student of HIB for the various purposes set out below
 - from your answers to any online and paper survey forms and questionnaires we ask you to complete.
 - from third parties, for example from your agent, or your previous or current school,
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college, university or employers who may provide a reference about you or who may sponsor your studies, or generally from any other stakeholder or member of the public

3. HOW WE KEEP YOUR DATA SECURE

- 3.1 HIB has in place a number of documents which outline how we keep your personal data secure. This includes our Privacy and Personal Data Protection Policy. These policies ensure that your personal data is kept secure and prevent unauthorised access or disclosure to your personal information.
- 3.2 The third parties whom we share your information with have an obligation to also keep your data secure and we do not engage with third parties who we cannot be satisfied will not keep your data secure.

4. CATEGORIES OF DATA COLLECTED

- 4.1 We may collect the following types of personal data and sensitive personal data about you. Personal data includes, but is not limited to, the following:
 - Your current and previous name(s), and contact information such as residential address, email address and contact number, as well as your date of birth, age, gender, and your passport number or national identity card details, country of domicile and your nationality/nationalities
 - if you are a non-Botswanan citizen, we will collect and record your immigration status and any other immigration status you may hold for any other country
 - imagery including video and or audio which is recorded through use of CCTV or other video/photographic capturing material in our premises
 - imagery including audio and video which is recorded through use of electronic platforms
 - information relating to your education and employment history, the school(s), college(s) and other colleges or universities you may have attended and places where you may have worked, the courses you may have completed, dates of study and examination results.
 - records relating to assessments of any course work, details of any examinations taken, any predicted and actual examination grades and any other information in your student record
 - information relating to your immigration history which we may also obtain from the Botswanan Government, as well your immigration history for any other country (if relevant)
 - information relating to your return or stay in your home country (if relevant)
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- information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the provision of appropriate pastoral care
 - financial information related to tuition fees and other financial charges such as course fees, scholarships (if applicable), payments made and outstanding debt
 - financial information related to living costs and source of funds (if relevant)
 - module information and academic performance
 - attendance and progression
 - awards
 - breaches of our policies, if relevant, such as academic or other misconduct concerning College or Institute activities

4.2 Special Category Personal Data we may collect from you may include:

- personal data revealing your racial or ethnic origin;
- personal data revealing your political opinions;
- personal data revealing your religious or philosophical beliefs;
- personal data revealing your trade union membership;
- your genetic data;
- your biometric data (where used for identification purposes);
- your data concerning health;
- your data concerning a person's sexual orientation.

4.3 Where Special Category Personal Data is collected, we recognise that if there is a breach of this data, it is likely to be more sensitive, or private to you, and therefore likely to cause more damage or distress to you if this information you have provided us is compromised. It is therefore given additional protection by HIB and in data protection legislation.

4.4 We also process contact and educational details after you cease being a student with us.

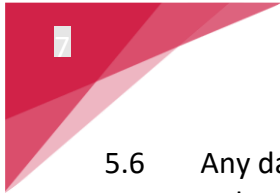
5. **HOW AND WHY WE USE YOUR DATA**

5.1 Data collected will be held securely in your electronic student file and/or hardcopy file, where relevant, and access is controlled. Only staff who have an operational requirement to access this information will be able to do so.

5.2 The purposes for which HIB will use your data includes:

5.2.1 processing your application, which may include, for example, seeking confirmation from other institutions and other relevant bodies of any entry qualifications that you have declared

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- 5.2.2 enrolling you as a student and maintaining your student record
 - 5.2.3 recording your academic progress
 - 5.2.4 processing survey results to give participants a voice as well as improve the quality of our services, performance and teaching, to name just a few. Please note if you do not wish to have any of your data or information processed in this way, you are free to opt out of completing any surveys
 - 5.2.5 obtaining your immigration records from the Government (if relevant) necessary for the performance of tasks we carry out in the public interest (e.g. teaching and research)
 - 5.2.6 administering the financial aspects of your studies, including tuition and other financial charges (e.g. library fines)
 - 5.2.7 providing or offering facilities and services to you during your time as a student and thereafter as part of HIB's legitimate business, including pastoral care
 - 5.2.8 sharing limited data with the HIB Student Union;
 - 5.2.9 sharing data with relevant internal or external auditors - for checking the integrity of our data and processes sharing data with our partners, agents, other agencies and public bodies, including our technology suppliers for example our hosting service provider
 - 5.2.10 submitting reports and statistics to government organisations and/or third parties, which is necessary to fulfil our statutory and legal obligations.
 - 5.2.11 monitoring equal opportunities
 - 5.2.12 safeguarding and promoting the welfare of students
 - 5.2.13 offering alumni services
 - 5.3 In other instances, for example, if you are an overseas student, we may from time to time disclose relevant parts of your personal information to organisations where legislation requires us to make a disclosure.
 - 5.4 Before we release your personal information we will ensure that such country has in place adequate legal protection for the privacy of your personal information. If a country does not have in place adequate legal protection for the privacy of your personal information, we will put in place appropriate safeguards to cover this e.g. contractual clauses.
 - 5.5 If you are an overseas student holding a student visa, we will maintain records of any visa refusal notices, enrolment and early course completion records and will notify the Government, as required, of the same, including ongoing engagement.
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- 5.6 Any data collected is on a legal basis and other sets are for processing for specific purposes, to be able to provide you with the service you expect at the same time as complying with laws and regulations. Therefore, if you were to object, we would not be able to enroll you as a student.

6. SHARING OF YOUR DATA GENERALLY

- 6.1 The information shared and the manner of disclosure will be in accordance with the provisions relevant legislation. More details on how we handle data are covered in our Privacy and Data Protection Policy.
- 6.2 Except for sharing your data with the third parties above, we will never share any of your data with any other third parties where it is not necessary to do so for the reasons also mentioned above or without asking for your explicit consent prior to the distribution of the information.

7. SHARING DATA WITH THE GOVERNMENT

- 7.1 In order to fulfil our obligations to the Government, and to comply with specific course designation criteria, we are required to provide personal data about you to Government bodies. This is a legal requirement and we will therefore not seek your permission to disclose data about you to the Government.

8. ATTENDANCE AND ENGAGEMENT MONITORING

- 8.1 Students enrolling on a course HIB agree to have their attendance and engagement monitored, and for the data to be used for intervention and reporting purposes, including reporting to third party agencies.
- 8.2 We monitor a student's attendance and engagement because we have a duty of care as a responsible institution to follow up promptly on matters of non-attendance and non-engagement so that students can be supported and given every opportunity to succeed. In addition, we may be obliged to comply with the requirements of Government bodies and other external agencies which require the monitoring and reporting of student attendance and engagement.

9. PERSONAL DATA RETENTION BY US

- 9.1 Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after you have completed your course with us.
- 9.2 In certain cases, information may be retained indefinitely by us in order to maintain your academic record and respond to any enquiries. The information that may be kept indefinitely includes:
- 9.2.1 Your name
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- 9.2.2 Date of birth
 - 9.2.3 Your student ID
 - 9.2.4 Your grades and achievement during your studies with us
 - 9.2.5 Your financial history with us
 - 9.2.6 Your immigration history

10. YOUR RIGHTS

10.1 You have the following rights:

10.1.1 The right to be informed

10.1.2 The right to subject access

10.1.3 The right to rectification

10.1.4 The right to object

10.1.5 The right to erasure

10.1.6 The right to portability

10.1.7 The right to restrict processing

10.1.8 The right to automated decision-making and profiling

10.2 Should you provide your consent and you wish to withdraw it, please contact our Data Protection Officer, DPO using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

11. CONTACT

11.1 If you have any queries about this Privacy Notice, about our Privacy and Personal Data Protection Policy or how we process your personal data or to request access to the personal data we hold about you, you can contact our Data Protection Officer by email, telephone or by post:

Email: Botswana@HolmesEducation.Group

Phone: +267 72 547 497

Post: Holmes Institute Botswana, Unit 1, Plot 1264, Old Lobatse Road, Gaborone, Botswana

12. REVIEW

12.1 This Privacy Notice is reviewed annually and may be updated from time to time subject to changes in legislative requirements.
