



Luminate Data Science Initiative Africa Data Usage and Privacy Policy

1. Introduction

Luminate is committed to responsible and ethical data handling. This policy outlines how we collect, use, share, and protect personal and non-personal data in accordance with applicable laws and regulations, including the General Data Protection Regulation (GDPR) and relevant privacy laws in African jurisdictions where we operate.

2. Scope

This policy applies to all:

Data collected through Luminate websites, online services, and platforms.

Data obtained from partners, research collaborators, clients, and other third parties.

3. Definitions

- a. **Personal Data:** Information relating to an identified or identifiable individual (e.g., name, address, email, IP address, online identifiers).
- b. **Sensitive Data:** Personal data revealing race, ethnic origin, political opinions, religious beliefs, health data, genetic data, biometric data, sexual orientation, or information related to criminal convictions.

Pseudonymization: Processing personal data in a way that it can no longer be attributed to a specific individual without additional information.

Anonymization: Irreversible removal of identifying elements from personal data.

Data Controller: Luminate is the data controller for data collected directly and from certain third parties.

Data Processor: Luminate may act as data controller or processor depending on the project and partner relationship.



4. Data Collection and Use

Types of Data Collected:

- Contact information (name, organization, email, etc.)
- Survey responses and feedback
- Website usage data (IP addresses, cookies)
- Research project data (may vary, explicit consent will be sought if sensitive data is collected)

Purpose of Collection:

- Providing and improving Luminate services
- Communicating with users and partners
- Conducting research and analysis
- Marketing and outreach (only with explicit consent)
- Compliance with legal obligations

5. Data Sharing

Luminate will only share data with third parties when:

Necessary to provide our services and fulfill contractual obligations

We have explicit consent from the data subject

It's required by law or a valid legal process

Data is anonymized or aggregated in a way that protects individual privacy



6. Data Security

Safeguards: Luminate implements technical, administrative, and physical safeguards to protect data against unauthorized access, alteration, disclosure, or destruction. Measures include:

Encryption of data in transit and at rest

Access controls and multi-factor authentication

Regular security training for staff

Incident response procedures

Data Retention

We only retain data for as long as needed to fulfill the purposes outlined in this policy or in specific project agreements.

Data is securely deleted or anonymized when no longer required.

1. Cross-Border Data Transfers

Luminate ensures data transferred outside its primary jurisdiction complies with relevant privacy laws

Mechanisms include:

Standard Contractual Clauses

Privacy Shield Frameworks (if applicable)

Assessing the adequacy of protection in the destination country

2. Individual Rights

Access: You may request a copy of your personal data held by Luminate.

Correction: You have the right to request correction of inaccurate personal data.

Deletion (Right to be Forgotten): Under certain conditions, you may request deletion of your personal data.

Restriction of Processing: You may request restrictions on the processing of your personal data.

Data Portability: You may request a portable copy of your personal data.

Objection: You may object to the processing of your personal data on legitimate grounds.

Withdrawal of Consent: If you've given consent for specific processing, you may withdraw it at any time.



3. Exercising Your Rights

Contact Luminate's Data Protection Officer (DPO) at info@luminatedatascienceafrica.org

Requests will be processed within a reasonable timeframe.

4. Changes to this Policy

Luminate reserves the right to update this policy to reflect changes in practices or laws.

The effective date will be displayed at the top.

Significant changes will be communicated to users.

5. Contact Information

Luminate Data Science Initiative Africa

P.O Box 150561

Data Protection Officer:

info@luminatedatascienceafrica.org

Effective Date: 19-Feb-2023