

PRIVACY POLICY FOR TERTIARY EDUCATION TRUST FUND (TETFund)

PREAMBLE

The Tertiary Education Trust Fund [hereafter referred to as “Data Controller” or TETFund] is an establishment of the Federal Government of Nigeria. The central mandate of TETFund is the rehabilitation, restoration, and consolidation of tertiary education in Nigeria. Our contact information is provided under ARTICLE 12 of this Data Privacy Policy.

This privacy policy is in furtherance of section 37 of the Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended), the Nigeria Data Protection Act (NDP Act) 2023, and all other legal instruments designed to protect the privacy rights of natural persons. As the “Data Controller”, we are cognizant of the privacy rights of all natural persons who are part of TETFund or interact with us on all our data processing mediums or platforms.

These classes of people, including staff and students of beneficiary institutions, research applicants, and our own employees, are our “Data Subjects”. As a responsible establishment, we are committed to safeguarding the privacy rights of our data subjects through this strict privacy policy. It shall complement the extant legal regulatory framework as an internal standard of care we owe our “Data Subjects”.

ARTICLE 1: OUR GUIDING PRINCIPLES ON DATA PROCESSING

In processing your personal data, we adhere strictly to the principles of data processing as set out under S.24 of the NDP Act. Our obligation is to ensure that personal data is:

- processed in a fair, lawful and transparent manner;
- collected for specified, explicit, and legitimate purposes, and not to be further processed in a way incompatible with these purposes;

- adequate, relevant, and limited to the minimum necessary for the purposes for which the personal data was collected or further processed;
- accurate, complete, not misleading, and, where necessary, kept up to date;
- retained for not longer than is necessary to achieve the lawful bases for which the personal data was collected or further processed; and
- processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, access, loss, destruction, or damage.

Furthermore, we are committed to ensuring accountability and upholding data Confidentiality, Integrity and Availability.

ARTICLE 3: OUR SCOPE OF DATA PROCESSING

In varying degrees, vis-à-vis the services and interventions we provide or your level of engagement with us, we do process your personal data. Below is a table containing the major types of personal data, the purpose, and the lawful bases for processing them:

S/ N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
1	Intervention Disbursement & Monitoring	Name, Phone, Email, Institutional Details, National Identification Number (NIN), Bank Verification Number (BVN).	LEGAL OBLIGATION & PUBLIC INTEREST.

2	Research Grant Applications (NRF)	Name, Phone, Email, Contact Address, Educational and Professional Records, Research Proposal Details.	CONTRACT & PUBLIC INTEREST.
3	Identity Management (BIMS/TERAS)	Name, Phone, Email, Date of Birth, Institutional ID, Academic Records, NIN.	CONTRACT & PUBLIC INTEREST.
4	Website Analytics & Communications	IP Address, Browser Information, Name, Phone, Email Address, Contact Address.	CONSENT & LEGITIMATE INTEREST (To ensure our services suit data subjects and measure performance).
5	Employment	Name, Phone, Email, Contact Address, Sex, Date of Birth, Passport, Medical and Educational Records.	CONTRACT. Some instances may involve other lawful bases like consent or legal obligation.

Please note that the categories of data and the lawful bases provided are not exhaustive. We are governed by the NDP Act and we process data without prejudice to your rights as a data subject.

ARTICLE 4: RIGHTS OF DATA SUBJECTS

We hold your privacy rights very dear to our operations. Apart from the right to give, withhold or withdraw consent, you have rights to all relevant information that may guide you in making informed decisions about your personal data. Your rights under the NDP Act include but are not limited to the following:

- a) Right to be Informed
- b) Right of Access
- c) Right to Rectification
- d) Right to Object to Processing
- e) Right to Data Portability
- f) Right to be Forgotten
- g) Right in Relation to Automated Decision Making

Note that you also have a right to lodge a complaint with the Nigeria Data Protection Commission (NDPC).

ARTICLE 6: TRANSFER OF DATA TO A THIRD-PARTY AND COUNTRIES

In carrying out our mandate effectively, we may require the services of third parties (e.g., for cloud storage, data analytics, software development) who may be within or outside Nigeria. In transferring your data to third parties, we shall be guided by the NDP Act. Where such services depend on consent, you have the right to decline and further restrict the processing of your personal data.

ARTICLE 7: TECHNICAL INFORMATION AND COOKIES

Our website is designed to collect your IP address and other information that your web browser typically shares with the websites that you visit. This helps us know you better and improve your experience. We also use “Cookies,” which are small text files downloaded to your device that memorize your preferences. We have taken measures to ensure that our use of cookies does not violate your privacy rights under the NDP Act.

ARTICLE 8: PERSONAL DATA SECURITY AND INTEGRITY

We use cutting-edge technologies and foolproof protocols to provide you with comprehensive layers of security for your personal data. We are constantly vigilant in preventing cyber-attacks, fraudulent intrusion, unauthorised access, loss or corruption of personal data. Accordingly, we conduct reviews of process and privacy impact assessments, carry out training, and obtain strict warranties where applicable.

ARTICLE 9: PURPOSE AND STORAGE LIMITATION

We collect and store personal data that is reasonably required by law or best practice to serve you or respond to legitimate enquiry about our transactions with you. The purpose of data processing determines the length of time your personal data is stored with us. We take this responsibility very seriously in view of the need for you to enjoy your privacy as guaranteed under the 1999 Constitution.

ARTICLE 10: CAVEAT ON WEBSITE LINKS

Our website may contain links to other websites. Any link to another website is not covered by our privacy policy. We strongly advise that you satisfy yourself with the details of any privacy policy provided on other websites or links.

ARTICLE 12: CONTACT INFORMATION

For inquiries, requests, or complaints regarding your personal data, please contact our Data Protection Officer (DPO):

Address: Tertiary Education Trust Fund (TETFund) No. 6, Zambezi Crescent, Off Aguiyi Ironsi Street, Maitama, Abuja, FCT, Nigeria.

Website: www.tetfund.gov.ng

Data Protection Officer:

- Wonuola Kolapo
- Fatima Ilyasu Muhammad

Email:

- Kolapoo@tetfund.gov.ng
- muhammadfi@tetfund.gov.ng

ARTICLE 14: ALTERATION OF PRIVACY POLICY

TETFund reserves the right to alter the foregoing policy for the purposes of advancing data privacy rights, public interest, or complying with lawful directives of the Federal Government – in line with the safeguards under the NDP Act and the 1999 Constitution.