
Learner Privacy Notice

Version 1.3 · Effective 31 October 2026

Approved by the Awarding Authority. Covers the checkout, the learning platform (including the optional course feedback forms), learner emails and the certificate register.

In short

- **What we hold.** Your order, your account, what you do on the course, your submissions and marks, and your assessment and certification records.
 - **Why.** To run your course, to mark and certify you, to keep the credential honest, to improve our courses, and to meet our legal and accounting duties.
 - **Who else handles it.** Our hosting provider, Cloudflare (network and video delivery, and our encrypted backups on Cloudflare R2), Resend (email), Microsoft 365 (our staff mailboxes) and Paystack (payments). If an organisation bought your seat from us, it is told only whether you claimed the seat and whether your enrolment is set up. Nobody else, unless the law requires it.
 - **What we never do.** We do not sell your data, and we do not use advertising trackers. Card and mobile-money details go to Paystack, never to us.
 - **What is public.** Only a certificate you have earned: your name, the certification, the issue date, the framework release and whether it still stands.
 - **Course feedback.** Answering a feedback form is optional. Our staff see your feedback without your name. The learning platform records that your account has answered, so that each person answers once; we do not use that record to identify you.
 - **Your rights.** You can ask what we hold, correct it, restrict or object to its use, or have it deleted where the law allows. We answer within the time the law sets: 7 days for access to your data, 14 days for most other requests. You can also complain to the Office of the Data Protection Commissioner.
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1. Who is responsible for your data

AUTO DIGITID SOLUTION LIMITED, trading as **Auto DigitID Africa**, a private company registered in Kenya (company number PVT-9XUGPDXV), is the data controller for the personal data described here. Its registered office is at Amalia Gardens, Kamiti Road, P.O. Box 35002-00100, Nairobi, Kenya.

Contact for anything in this notice: info@autodigitid.africa, subject "Data protection", or by post to the registered office above.

2. What we collect, and why

What	When we collect it	Why we need it	Lawful basis
Your order: first and last name, email, country (optional), the course and price, the currency and exchange rate used, the IP address the order came from, the time, and the versions of the learner terms, this notice and the payment terms you accepted	At checkout on autodigitid.africa	To take your order, enrol you, and prove what you agreed to	Contract; legal obligation (accounting)
Your payment result: Paystack's reference, the amount, the currency, the payment method type (card or mobile money) and the time paid. Never your card or mobile-money number	From Paystack, after you pay	To confirm payment before granting access, and to handle refunds	Contract; legal obligation
Your account: name, email address (also your login), password (stored by the platform only in hashed form), and anything you choose to add to your profile	When your place is created; when you edit your profile	To give you a secure, personal account	Contract
Your learning activity: enrolments, progress and completion, knowledge-check, quiz and interactive-activity attempts and answers, and competency records	As you use the course	To open each module as you pass the one before it, and to show you your progress	Contract
Your submissions and results: written work, lab evidence, files you upload, assessor marks and feedback, moderation and quality-assurance records	When you submit and when you are marked	To assess you against the standard, and to show the result is sound	Contract; legitimate interest in assessment quality
Activity logs: each page you open on the learning platform, with the time and the IP address it came from	Automatically, as you use the platform	Security, investigating misuse, integrity cases, and fixing faults	Legitimate interest
Policy acceptances: which version of each policy you accepted, and when	When you accept on the learning platform	To prove what you agreed to	Contract; legitimate interest
Integrity case records (if there is a case)	Under the Academic Integrity Policy	To decide a case fairly, and to keep the credential honest	Legitimate interest; legal claims
Adjustment requests and supporting evidence, which may include health information	Only if you ask for an adjustment	To put the adjustment in place	Your explicit consent for health information
Certificate register entry: certificate ID, level and certification name, your name, issue date, framework release, and status (with the date and reason for any change)	When you are awarded a credential	So that anyone can verify the credential, and so it can be revoked if necessary	Contract; legitimate interest in public verification
Messages to us	When you write to support@ or info@	To answer you	Contract; legitimate interest
Course feedback (optional): your answers to a module or programme feedback form (ratings, the pace, the hours you spent, a 0 to 10 recommendation score, and anything you write in the text boxes), and the platform's record that your account has answered	Only if you choose to answer a feedback form on the learning platform	To improve our courses and the programme	Legitimate interest

What is checked at the final assessment (for example the type of identity document and its last four digits) is set out in the notice for your sitting. For an online sitting, that is the **Online Assessment Privacy Notice**, which you see before you sit.

Course feedback is anonymous to our staff. A course may include optional feedback forms, for example one at the end of each module and one for the programme as a whole. You do not have to answer them, and answering or not never affects your progress, your marks or your credential.

- Our staff see your feedback without your name.
- The learning platform records that your account has answered, so that each person answers once; we do not use that record to identify you.
- You can answer each form once, and you cannot change your answers afterwards.
- Learners never see the results.
- The forms do not ask for personal details, so please do not include any. If you write something that identifies you, our staff will see it.
- Like any page you open, opening and sending a form appears in the activity log. The log does not contain your answers.

3. What anyone can see: certificate verification

Anyone with your certificate ID or QR code can check your credential. A check shows **only**:

- the certificate ID;
- the certification;
- your name;
- the issue date;
- the framework release;
- whether it still stands (valid, or revoked);
- the pathway and concentrations the award carries.

It never shows your email address, scores, cohort, assessor, or anything else we hold. A capstone portfolio entry (Expert level) is published **only with your separate, explicit consent**, and comes down if you withdraw that consent. Employer and client names are never stored in it.

4. Automated processing

- Knowledge checks, quizzes and the objective section of each module assessment are **marked automatically**. The next module opens automatically when you pass.
- You can ask for a **mark review** by a person.
- **A credential is never awarded, refused or withdrawn by an automated decision alone.** Written work and practical work are marked by assessors. An integrity concern is always decided by a person, under the Academic Integrity Policy.

5. Who we share it with

We use a small number of service providers. Each handles your data only to provide its service to us.

Provider	What it does for us	What it handles
Netcup (hosting)	Runs the servers for the learning platform, the website, the order records and the certificate register	Everything described in section 2, stored on servers in Austria (Vienna, European Union)

Provider	What it does for us	What it handles
Cloudflare	Carries traffic to the learning platform, delivers course videos from its R2 storage (media.autodigitid.africa), and keeps our encrypted backups in Cloudflare R2	Your IP address and the pages and videos you request. Course videos contain no personal data. The backups hold what section 2 describes, encrypted
Resend	Delivers our emails, for example your welcome email, your "portal is ready" email, password resets and course notifications	Your name, email address and the content of the email
Microsoft 365	Hosts our staff mailboxes (for example support@ and info@)	The messages you send us and our replies, with your name and email address
Paystack	Takes your payment on its own secure page	Your payment details. Paystack is responsible for them under its own privacy policy

We also share data with:

- **Our assessors, quality assurers and appeal reviewers**, to the extent their role needs. External reviewers are bound by confidentiality.
- **An organisation that bought your seat from us** (for example a training provider that resells our courses), for the seats it bought: only whether you claimed the seat, when, and whether your enrolment is set up. Never your progress, answers, marks or results unless you agree to it separately. The privacy notice addendum for invited learners explains this.
- **An organisation that paid for your place**, but only what its agreement with us provides for, and only what you were told at enrolment (for example, whether you enrolled, completed and were certified).
- **Authorities**, when the law requires it.

We do not sell your data. We do not use it for advertising, and we do not share it with anyone for their own marketing.

6. Data sent outside Kenya

Our servers are in **Austria** (Vienna, European Union). Cloudflare's network is worldwide, and Resend and Paystack may process data in other countries. Microsoft 365 (our staff mailboxes) and Cloudflare R2 (our encrypted backups) may also hold data outside Kenya. We rely on the safeguards the Data Protection Act 2019 and its regulations require for transfers outside Kenya.

7. How long we keep it

Record	How long
Order and payment records	7 years , in line with Kenyan tax and accounting practice.
Your account, enrolments and progress	For the life of your account, plus 2 years after your last activity (so you can come back and resume), then deleted or anonymised
Submissions, marks, and assessment and certification records	6 years , the period the Academic Integrity Policy and the Accommodations Procedure already set
Integrity case records	6 years , as the Academic Integrity Policy sets out
Adjustment decisions	6 years , with the assessment record
Medical or supporting evidence for an adjustment	Deleted when it is no longer needed , as the Accommodations Procedure sets out
Policy acceptance records	As long as your account and assessment records are kept
Activity logs on the learning platform	12 months (365 days) , then deleted automatically
Certificate register entry	Permanently . The register is the evidence that the credential exists. A revoked credential stays, marked revoked, and the revocation is recorded

Record	How long
Recordings of an online assessment session (if any)	As the Online Assessment Privacy Notice sets out: until your Final Result Date plus 30 days, then deleted
Course feedback responses	2 years after you send them , then deleted, together with the record that your account answered. Statistics made from them that identify nobody (for example average ratings and counts) are kept

8. Your rights

Under the Data Protection Act 2019 you have the right to:

- be told how your data is used (this notice);
- see the data we hold about you;
- have inaccurate data corrected;
- have data deleted where the law allows;
- have our use of it restricted (for example, while you contest its accuracy);
- object to our use of it;
- receive it in a portable form;
- withdraw any consent you have given.

How to ask, and how quickly we answer. Write to info@autodigitid.africa, subject "Data protection". We answer within the period the Data Protection (General) Regulations, 2018 set for each right, counted in calendar days from the day we receive your request:

Your request	We answer within
To see your data, or get a copy of it	7 days
To correct inaccurate data	14 days
To delete data	14 days
To restrict our use of it	14 days
To object to our use of it	14 days
To receive it in a portable form	30 days

If we cannot do all or part of what you ask, we tell you in writing, with our reasons, within **7 days**, and we tell you that you can complain to the Office of the Data Protection Commissioner.

Other complaints about how we handle your data: we acknowledge them within **5 working days** and give a full response within **20 working days**.

Limits:

- We cannot delete a certificate register entry for a credential that was issued.
- We keep assessment and integrity records for the periods above, even if you close your account.

Complaints: you can complain to the **Office of the Data Protection Commissioner** (odpc.go.ke). We would like the chance to put things right first.

9. Security

- Card and mobile-money details never reach our servers.
- Passwords are stored only in hashed form, and we never email one.

- Traffic to our services is encrypted in transit.
- Staff and assessor access uses named accounts, with permissions limited to each role.
- Service credentials are kept in files readable only by the service that needs them.

10. Cookies

- The learning platform uses the **cookies it needs to keep you signed in**.
- The website sets **no analytics or advertising cookies**, and neither service embeds third-party trackers.

11. Children

You must be 18 or over to enrol yourself. A learner under 18 can join only through an institution (a TVET college, a university or an employer) that has confirmed their parent's or guardian's consent under its own agreement with us. Nobody can accept these policies on someone else's behalf on the learning platform.

12. Changes to this notice

Each version has a number and a date. When a change affects how your data is used, we publish a new version on the learning platform. We ask you to acknowledge it before you continue.

Document control

Version	1.3 (2026-10-31)
Status	Approved by the Awarding Authority, 31 October 2026. In force from publication.
Owner	The Awarding Authority
Related	Learner Terms and Conditions v1.1; Seat Terms v1.0 and the privacy notice addendum for invited learners v1.0; Online Assessment Privacy Notice v1.1 and its DPIA outline (shown in the exam course before an online sitting); website privacy notice (enquiry form); Academic Integrity Policy v1.1; Accommodations Procedure v1.1
Controller	AUTO DIGITID SOLUTION LIMITED (company number PVT-9XUGPDXV), trading as Auto DigitID Africa