



## LEARNER PRIVACY POLICY

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We periodically review this policy and we will publish any changes on this website which will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are processing your information.

### 1. Who we are

ALX Holdings Limited, a private company registered in Mauritius under company number C213364 and with its registered office address at Lot O2, Floor 1, CentrePoint, Trianon, Mauritius (“ALX”, “we” or “us”).

We act as a ‘controller’ of the personal data to all information collected through our website ([www.alxafrica.com](http://www.alxafrica.com)), “Website”, “ALX Africa” or collected for the Services, as identified below.

### 2. Purpose and Scope

- 2.1. ALX Africa is a community of passionate, courageous ‘doers’ where we help the world’s top talent to fulfil their potential. At ALX Africa, applicants receive best-in-class training to prepare, launch and grow their career.
- 2.2. The purpose of this policy is to outline how ALX collects, uses, stores, shares, and protects the personal information of individuals who interact with you as learners, clients, or prospective learners. This policy demonstrates our commitment to safeguarding personal data and ensuring transparency in our data handling practices in line with applicable data protection laws and industry best practices.
- 2.3. This policy is designed to help learners and clients understand:
  - 2.3.1. What personal data we collect and why,
  - 2.3.2. How we use and protect that information,
  - 2.3.3. With whom we may share it and under what circumstances, and
  - 2.3.4. What rights and choices learners and clients have regarding their personal data.
- 2.4. This privacy policy applies to all information collected through our website (such as <https://www.alxafrica.com/>), and/or any related services, sales, marketing or events (we refer to them collectively in this Privacy Policy as the “Services”). We detail below the purposes of processing, type of personal data and legal basis for the processing. Our Privacy Policy applies to any learner or client of ALX Africa or visitor to ALX Africa Platform or applications operated by ALX Africa. This policy applies to all personal information collected, processed, or stored by ALX from:
  - 2.4.1. Current and prospective learners, including applicants to ALX programs;



- 2.4.2. Clients and corporate partners engaging with ALX for upskilling, or talent pipeline services;
- 2.4.3. Alumni who continue to engage with ALX programs or platforms;
- 2.4.4. parents/guardians of learners or applicants to ALX programs;
- 2.4.5. Any individuals interacting with ALX platforms, services, ALX events or marketing/sales initiatives, websites, or communications in the context of learning and career development.

### 3. Principles

- 3.1. The processing of personal information at ALX is governed by the following core principles:
  - 3.1.1. Lawfulness, Fairness, and Transparency: We process personal information in a lawful, fair, and transparent manner. Individuals are informed about how their data is collected, used, and shared.
  - 3.1.2. Purpose Limitation: Personal data is collected for specific, explicit, and legitimate purposes only, and not further processed in a manner incompatible with those purposes.
  - 3.1.3. Data Minimization: We collect only the personal information that is relevant and necessary for the purposes stated.
  - 3.1.4. Accuracy: We take reasonable steps to ensure that personal information is accurate, complete, and kept up to date.
  - 3.1.5. Storage Limitation: Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable laws and regulations.
  - 3.1.6. Integrity and Confidentiality (Security): We implement appropriate technical and organizational measures to ensure the security of personal data and protect it against unauthorized access, loss, or destruction.
  - 3.1.7. Accountability: ALX is responsible for and able to demonstrate compliance with these principles, ensuring that data protection is embedded in all of our processes and systems.
- 3.2. We never sell personal data to anyone for any purpose. We do not give personal data to others for their own use.

### 4. Definitions

<b>ALX group companies</b>	Legal entities affiliated with ALX and incorporated in Egypt, Kenya, South Africa, Nigeria, Ghana, Ethiopia, Morocco, and Rwanda
<b>Anonymization</b>	The process of removing personally identifiable information so that the data cannot be associated with a specific individual.

<b>Consent</b>	A freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of their personal data.
<b>Controller</b>	The entity (in this case, ALX Holdings Ltd.) that determines the purposes and means of the processing of personal data.
<b>Data Protection Authority</b>	Means any competent regulatory authority responsible for enforcing data protection legislation.
<b>Data Protection Impact Assessment (DPIA)</b>	A formal process to assess risks to rights/freedoms of individuals from high-risk processing.
<b>Data Protection Legislation</b>	Includes all applicable data protection and privacy laws in any relevant jurisdiction, including associated guidance, codes, and regulations.
<b>Data Subject</b>	The individual (learners, client, applicant, visitor, parent/guardian or user) whose personal information is being collected, held, or processed.
<b>Legitimate Interest</b>	A lawful basis for processing personal data when it is necessary for the interests of ALX, provided these are not overridden by the rights of the data subject.
<b>Personal Information / Personal Data</b>	Any information relating to an identified or identifiable natural person, such as name, email address, identification number, online identifiers, or other factors specific to their identity.
<b>Privacy by Design and by Default</b>	Embedding data protection principles into system design and ensuring data is only processed as necessary.
<b>Privacy Policy</b>	This document outlines how personal information is collected, used, stored, and protected by ALX.
<b>Processing</b>	Any operation performed on personal data, whether by automated means or not, such as collection, recording, storage, use, transfer, or deletion.
<b>Processor</b>	A third party or service provider that processes personal data on behalf of the data controller.
<b>Retention Period</b>	The amount of time that personal information is stored before it is securely deleted or anonymized.
<b>Sensitive Personal Information</b>	Special categories of personal data, such as health records, biometric data, racial/ethnic origin, religious beliefs, or other information requiring enhanced protection.

<b>Third Party</b>	Any individual or organization that is not the data subject, the controller, or the processor, but may be involved in processing personal data.
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**5. How we use Personal Data About you**

- 5.1. We use your personal information in ways that are fair, safe, and legal. Depending on what data we collect and what we use it for, we rely on one of these legal grounds:
  - 5.1.1. You gave us permission (consent)
  - 5.1.2. We need it to provide you with a service (like setting up your learning account)
  - 5.1.3. It's required by law
  - 5.1.4. It helps us run our services better (our legitimate interest), and we make sure it doesn't harm your privacy

**6. Purpose and Details of processing**

- 6.1. We collect personal information that you provide to us.
- 6.2. We collect personal information that you voluntarily provide to us when applying for ALX courses and Services, expressing an interest in obtaining information about us or our products and services, when participating in activities initiated by us (such as posting messages in our online forums or entering competitions, contests or giveaways, legacy points & rewards) or otherwise contacting us.
- 6.3. All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.
- 6.4. The personal information that we collect depends on the context of your interactions with us, the choices you make and the products and features you use, as detailed above.
- 6.5. Other personal data resulted from your use of the ALX Africa Platform or attending our events and other activities, as described above.

<b>PURPOSE: PROVIDING AND MANAGING ACCESS TO ALX AFRICA COURSES</b>	
This includes user support, communications, and platform services.	
Types of Personal Data:	Legal Basis:
Identification details, such as name, ID/passport, age, date of birth, gender, address, area code, country of residence, country of origin (Identification details)	Performance of a contract (user account, learning services)

Contact details, such as e-mail, phone number, username (Contact data)	<p>Legitimate interest (platform improvement)</p> <p>Consent (for recorded content or optional features)</p>
Education & employment history, CVs, certifications and other details (such as field of study, highest level of education, language spoken, employment status, current occupation, profession, technical specialty, years of paid work experience, soft skills, technical skills) (Education and Employment data)	
ALX course progress, status and assessments	
IP address, usage data	
LinkedIn profile, public information (such as maiden name, nickname; current and former address; business email; business phone number; information available on the LinkedIn profile (including data on new employment)) (Public Information)	
Social media details (if used to sign in or as communication channel)	
Voice/image (for onboarding/support recordings)	
Payment information (e.g., credit card details and the security code)	
<p><b>PURPOSE: ALX AFRICA – PROGRAMME RECRUITMENT &amp; SELECTION</b></p>	
<p>Application review, selection, and onboarding.</p>	
Types of Personal Data:	Legal Basis:

Application, Contact Data and Identification Details	Consent (to enter selection) Performance of a contract (if selected)
Education and Employment Data	
Public Information	
Application status (approved, waitlisted, rejected)	
Audio/video for interviews and technical logs (IP, timestamps)	
<b>PURPOSE: DELIVERING ALX PROGRAMS, ADMIN, COMMUNICATIONS &amp; SUPPORT</b>	
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>
Contact data and Identification details	Performance of a contract (if selected) Consent (to share learner performance data with guardians or sponsors) Consent (to share with guardians or sponsors)
Learner performance data (scores, tests, milestones, peer grading, status, learning progress)	
Parent/guardian details (for minors), such as full name, email, phone number, kinship/legal guardian (Guardian contact)	
Recorded voice/image metadata for support	
<b>PURPOSE: USE OF CO-WORKING SPACES (HUBS)</b>	
Processing activity performed by ALX group companies as controllers	
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>
Contact data and Identification data	Performance of a contract

Education and Employment data	Legitimate interest	
Data collected when attending the hub (e.g. image, audio, booking and attendance data)		
<b>PURPOSE: MARKETING (COMMERCIAL COMMUNICATIONS, EVENTS, WORKSHOPS, CAREER OPPORTUNITIES, NEWSLETTERS)</b>		
ALX group companies will be controllers or marketing actions performed locally		
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>	
Contact data and Identification details	Consent	
Event attendance data (including image/video at events or recordings for online workshops) and LinkedIn profile		
Website interaction data (clicks, time spent, bounce rates, traffic source, device type, operation system, views, keywords used, posts engaged with, impression count) (Web interaction data)		
IP (for webinars), user logs (e.g. for email communications, for webinars, marketing insights)		
Guardian contact (if applicable)		
Education & Employment data		
<b>PURPOSE: LOYALTY AND REWARDS PROGRAMME</b>		
<b>Types of Personal Data:</b>		<b>Legal Basis:</b>
Contact data and Identification details		

Engagement history and community platform activity(e.g., create/host an events, attend events, comments, self-reporting, pitch video, complete an ALX course)	Legitimate interest for growing ALX Africa community
Rewards redemption details	
Badges award process and badge public verification page	
Profile and usage stats, Web interaction data, video uploads	
<b>PURPOSE: FEEDBACK AND SURVEYS</b>	
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>
Contact data and Identification details	Consent
Education and Employment data	
Participation in surveys or focus groups	
Voice/image for recorded sessions, metadata for calls	
Technical data (such as IP address, location, the browser and platform/device data, usage metrics)	
Preferences and pain points shared	
<b>PURPOSE: DATA ANALYSIS, STATISTICS, AND REPORTING</b>	
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>
Contact Data and Identification details	Legitimate interest Consent (for sensitive data)
Education and Employment data	

Learner demographics, course progress, scores and performance data, peer review	
Platform engagement metrics, browsing behavior	
The humanitarian status (e.g. refugee, asylum seeker, or internally displaced person), diversity and inclusion data (e.g. disability, living circumstances, income)	
<b>PURPOSE: SECURITY, LEGAL, AND BUSINESS OPERATIONS</b>	
This includes managing IT systems, ensuring security, fixing technical issues, meeting legal and tax obligations, handling legal requests or claims, supporting business changes like mergers or spin-offs, and improving internal communication.	
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>
All data processed as part of your engagement with ALX	Legal obligation Legitimate interest Contract performance Consent (for recordings)
Audio/video recordings of hearings (with consent) Written statements or notes in lieu of recordings Associated metadata (e.g., timestamps, participants)	
<b>PURPOSE: USE OF COOKIES AND TRACKING TECHNOLOGIES</b>	
Please check our <a href="#">Cookie Policy</a> for more details.	
<b>Types of Personal Data:</b>	<b>Legal Basis:</b>
IP address, browser type, device information, referring/exit pages, interaction data, session duration	Contract performance (site security, functionality, analytics)

Cookie IDs, user preferences, tracking pixels, web beacons	Consent (for non-essential cookies)
Click behavior, page visits, bounce rates, time spent on site	Consent (for personalized content and marketing purposes)
Geolocation data (approximate), ad tracking IDs (if applicable)	Consent (explicit opt-in required via cookie banner)

- 6.6. Special categories data is collected in limited cases with explicit consent.
- 6.7. Some of your legal rights will depend on which legal basis we are relying on for processing. Please see the Your Rights section below.

## 7. Do We Collect Information from Minors?

- 7.1. In cases where minors under 18 are granted access to our programs through parental or guardian consent, we may collect the personal data of both the minor and their parent or guardian, as necessary for participation.
- 7.2. We ensure that such consent is verifiable and retained as part of our compliance requirements. Personal data of minors is handled with heightened care and is not used for marketing or profiling purposes without explicit permission from the parent or guardian.

## 8. Direct Marketing

- 8.1. If you are an existing or previous member of part of the ALX ecosystem, we may send you promotional emails about initiatives or services that are similar to what you have done with us before. You have the right to opt out of receiving these emails at any time by:
  - 8.1.1. contacting us by email at support@alx.app; or
  - 8.1.2. using the 'unsubscribe' link at the bottom of the email.
- 8.2. However, we will still need to send you service-related emails that are necessary for the administration and use of your account.
- 8.3. In all other circumstances, we will only send marketing emails to your individual email if you have explicitly opted in to our marketing list in advance.
- 8.4. We never sell personal data to anyone for any purpose. Also, we will not give your data to others for their own use without your permission.

## 9. Who we Share Personal data with

- 9.1. We may need to process your data or share your personal information in the following situations:

- 9.1.1. We may share your data with third-party vendors, service providers, consultants, contractors or agents who perform services for us or on our behalf and require access to such information to do that work, such as:
  - 9.1.1.1. IT maintenance and service providers, providers of software applications through which our IT systems and document management activities are carried out (including Google workspace, especially for e-mail end document storage), as well as the hosting of these software applications,
  - 9.1.1.2. Data analysis, data statistics, surveys/feedback, customer service. We may allow selected third parties to use tracking technology on The ALX Africa Platform or on the Services, which will enable them to collect data about how you interact with the platform over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity.
  - 9.1.1.3. Service providers which we use for managing and allowing access to ALX Africa Platform, or to service providers for managing and allowing access to our courses, payment processing, for lead generation and for marketing communications, call center services, third-party advertisers to serve ads when you visit ALX Africa Platform, of workflow (CRM), productivity software solutions, e-mail delivery and e-mail outreach service providers, email validation service providers, providers of self-service ticketing platform for live experiences, providers of video-conference solution or of the asynchronous video interview solution.
  - 9.1.1.4. Service providers for our administrative/secretarial services, internal organisational flows, such as our digital productivity, collaboration, and organisational app, video-conferencing solutions and calendar application services.
- 9.2. Such third-party service providers are also not allowed to reuse your personal data for their own purposes.
- 9.3. We sometimes share personal data with third parties as part of providing our services or to comply with our legal duties. These third parties can include:
  - 9.3.1. Public authorities. We may share your information with law enforcement agencies, public authorities or other organizations, if legally required to do so. This includes tax authorities, auditors, various categories of consultants or institutions with powers to carry out inspections and controls our activity and assets, who request us to provide information, by virtue of our legal obligations, courts, public notaries, bailiffs, official company registry.
  - 9.3.2. Group and affiliated companies. We may share your information with ALX group companies; or with persons or entities that are also engaged in the African Leadership mission (such as ALU Foundation, African Leadership University Ltd, or ALX donors).

- 9.3.3. Business partners. We may share your information to offer you certain products, services or promotions, including information about scholarships or admission requirements with our university partners or with our finance partners. We do this when we work together with our partners on a common purpose; or
  - 9.3.4. Third party acquirers/potential acquirers and to their auditors and consultants. We may share or transfer your information for negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- 9.4. We also act as data processors, when we share your data upon instructions and on behalf of other controllers. These scenarios can include sharing data with: universities and our partners in the Pathway program. We may assist these parties with collecting and sharing data about you for their selection process, for the scholarship award activities or for financial aid/applications. The types of documents and data will be decided by the controller, but would be related to your identification data (e.g. passport/ID), contact data and learner records.

## **10. Use of Cookies and Tracking Technologies**

- 10.1. We use cookies and similar tracking technologies (such as web beacons, pixels, and scripts) to enhance your experience on the ALX Africa Platform, analyze usage, personalize content, and support marketing efforts. Cookies may collect information such as your IP address, browser type, device information, referring/exit pages, and interactions with our Services.
- 10.2. When you first visit our website, we display a cookie consent banner. You can choose to accept or decline non-essential cookies, and you can update your preferences at any time. Essential cookies necessary for site functionality will be set regardless of consent.
- 10.3. We honor your rights under applicable data protection laws and only use non-essential cookies if you have given us explicit consent.
- 10.4. [Cookie Policy](#)

## **11. How we Store and Secure Personal Data**

- 11.1. The ALX Africa Platform central database is held in AWS cloud and hosted in Ireland. However, for our software engineering programs we store your data in the USA.
- 11.2. Registration documents are initially collected and retained by ALX Africa for up to 90 days. After this period, they are securely uploaded to a third-party provider, Persona. Persona safeguards data using industry-standard security measures, including encryption, tokenization, and secure storage protocols. Sensitive information is encrypted at rest using AES-256 encryption, and all data transmitted is protected via HTTPS with TLS 1.2 or higher. For Reusable Personas, data is stored using Passkey technology, with the passkey itself securely stored only on the end-user's device.
- 11.3. Generally, we only store data with a provider if we are satisfied they protect it with robust policies and cybersecurity measures.

- 11.4. We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.
- 11.5. All external processors have contracts with us. They are required not to reuse your personal data for their own purposes unless they observe the applicable privacy requirements.

## **12. Transferring your Personal Data to other Countries**

- 12.1. ALX Africa data is transferred to Ireland for the central database and to the United State of America (by using several service providers which host data in the United States of America, such as AWS, HubSpot, SuperSet, SalesForce, Google suite, Holberton). Also, sometimes we need to send personal data to other countries, such as when we send data to ALX group companies (Egypt, Kenya, South Africa, Nigeria, Ghana, Ethiopia, Morocco, and Rwanda).
- 12.2. We take note here of the adequacy decision of the European Commission for the [EU-U.S. Data Privacy Framework](#), which concludes that the United States ensures an adequate level of protection – comparable to that of the European Union – for personal data transferred from to US companies under the new framework. AWS, HubSpot, SalesForce, Google are already part of the [EU-U.S. Data Privacy Framework](#).
- 12.3. When we send data to a country that does not have “adequate” data protection laws according to the European Commission (EC), we will only send the data after agreeing to the standard data protection contract clauses approved by the EC. You can see a copy of these standard clauses on the EC website here: [Standard Contractual Clauses \(SCC\) \(europa.eu\)](#). We will also take supplementary measures, if necessary, to compensate for any lack of protection afforded by the laws of the recipient country.
- 12.4. If you would like further information about data transfers to other countries please contact us.

## **13. How long do we keep Personal data**

- 13.1. We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law (such as tax, accounting or other legal requirements).
- 13.2. No purpose in this policy will require us keeping your personal information for longer than 90 days past the termination of the user’s account.
- 13.3. If you ask us to delete your user account, we will delete your account data promptly, as we will have no further use for it once you stop using the platform.
- 13.4. Generally, when we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.



13.5. If you have any questions in this regard, or any concerns about how long we keep your information for, please contact us using the details below.

#### **14. Your Rights**

- 14.1. You have rights over the personal information we hold about you. You can:
- 14.1.1. Ask for a copy of your personal information
  - 14.1.2. Ask us to correct information that's wrong
  - 14.1.3. Ask us to delete your information (with some exceptions)
  - 14.1.4. Ask us to stop using your information in certain cases (like if it's wrong or you're waiting for a response)
  - 14.1.5. Ask us to send your data to you or someone else in a format you can use.

#### **15. You can Also**

- 15.1. Say no to us using your data for direct marketing
- 15.2. Say no to certain other uses of your data—especially when it's based on our legitimate interests
- 15.3. If you gave us permission to use your data and want to change your mind, you can withdraw your consent anytime.
- 15.4. Even if you do, we may still need to keep or use some information—for example, to meet legal requirements or protect our rights.
- 15.5. To use any of these rights, just email us at [support@alxafrica.com](mailto:support@alxafrica.com).

#### **16. Do California, United States Residents have specific Privacy Rights?**

- 16.1. Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.
- 16.2. California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.
- 16.3. If you are under 18 years of age, reside in California, and have a registered account with the ALX Africa Platform or Services, you have the right to request removal of unwanted data that you publicly post on the ALX Africa Platform. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is



not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from our systems.

## **17. Complaints**

- 17.1. If you wish to complain about our use of personal data, we would appreciate the chance to deal with your concerns first. If you still wish to complain, please consult the Mauritius Data Protection Office website at <https://dataprotection.govmu.org/>
- 17.2. If you are resident in the EEA (which includes the EU), the GDPR also gives you the right to lodge a complaint with your local data protection regulator.

## **18. How to Contact us**

ALX Holdings Limited  
Lot O2, Floor 1  
CentrePoint  
Trianon  
Mauritius  
support@alxafrica.com

or our

Data Protection Officer  
dpo@alxafrica.com

or our

EU Representative  
Kinstellar SPARL  
201 Barbu Vacarescu  
Globalworth Tower, Floor 22  
020276 Bucharest, Romania  
art27.representation.romania@kinstellar.com

We never sell personal data to anyone for any purpose. Also, we will not give your data to others for their own use without your permission.