Kingdom of Saudi Arabia Ministry of Education University of Tabuk Data Management Office



المملكة العربية السعودية وزارة التعليم جامعة تبوك مكتب وحدة حوكمة البيانات





# **Document Specifications**

| Document Title        | Personal Data Privacy Policy |
|-----------------------|------------------------------|
| Institution           | Tabuk University             |
| <b>Document Owner</b> | Data Management Office       |
| issue Number          | 1.0                          |
| Status                | issued                       |
| issue Date            | 11 January 2024              |
| Document              | internal                     |
| Classification        |                              |

## **Modifications**

| Issue | Date                  | Modifications | Edit                     | Review                     | Approval                               |
|-------|-----------------------|---------------|--------------------------|----------------------------|--|
| 1.0   | 11<br>January<br>2024 | None          | Dr. Mariam Al-<br>Shihry | Dr. Mohammed Al-<br>Otaibi | Digital<br>Transformation<br>Committee |

# **Approvals**

| Name  | Position   | Date             | Signature      |
|---|--|------------------|----------------|
| Dr. Mohammed Mutaib<br>Al-Otaibi                  | Director of Data<br>Management Office            | 11 January 2024  |                |
| Members of Digital<br>Transformation<br>Committee | Standing Committee for<br>Digital Transformation | 15 February 2024 | Meeting minute |



# Glossary

| Term  | Definition   |  |
|---|--|--|
| The University  | University of Tabuk  |  |
| Business<br>Directories   | Agencies, Deanships, Units, Directorates, Departments  |  |
| Data  | Unprocessed set of facts, such as numbers, letters, still images, video, audio recordings, or emojis   |  |
| Personal Data   | Any statement—regardless of its source or form—that can lead to the identification of an individual, either directly or indirectly when combined with other data. This includes, but is not limited to, names, personal identification numbers, addresses, contact numbers, bank account and credit card numbers, health data, still or moving images of the user, and other personal or special-characteristic data from which a specific individual can be identified. |  |
| Accessing Data  | Logical and Physical access to the university's data and technical resources for the purpose of using them.  |  |
| Data Subject Person to whom the personal data relates, or their representative, or the who has legal guardianship over them |  |  |
| Personal Data<br>Processing   | All operations carried out on personal data by any means, whether manual or automated. These operations include, but are not limited to, collecting, transferring, saving, storing, sharing, destroying, analyzing, extracting patterns, drawing conclusions, and linking with other data.   |  |
| Personal Data<br>Disclaimer   | Enabling any person—other than the University's Data Management Office—to obtain, use, view, or access personal data by any means and for any purpose.   |  |
| Personal Data<br>Breach   | Disclosure of personal data, obtaining it, or enabling access to it without authorization or legal basis, whether intentionally or unintentionally   |  |
| Destruction of<br>Personal Data   | Any action that results in the removal of personal data, making it impossible to access or recover, including erasure or deletion, whether electronic or physical.   |  |
| Privacy Notice  | An external statement addressed to individuals that explains the content of personal data, the methods of its collection, the purpose of its processing, how it will be used, the relevant parties with whom the data will be shared, the retention period, and the method of disposal   |  |
| Data<br>Classification<br>Levels  | Highly Confidential, Confidential, Restricted, Public  |  |



#### Error! Bookmark not defined.

**1.1** 4**1.2** 4**1.3** Policy Clauses

4**1.4**4**1.5** 42.

8

12

2.1 Error! Bookmark not defined.2.2

5**2.3**6**2.4** 6**2.5** 

83. Related Documents

#### 1.Introduction

#### 1.1 Purpose of the Document

In response to the controls of the National Data Management Office and the relevant standards requiring the establishment of data governance policies within governmental entities, and based on the national data governance policies that have been developed, the University's Data Office has developed a Personal Data Protection Policy in alignment with the policies of the National Data Management Office.

The purpose of this policy is to demonstrate the University's commitment to protecting the privacy of beneficiaries' personal data. This policy aims to establish the fundamental rules for safeguarding personal data that is processed and must be followed by the University's business departments to ensure the security of personal data for users.

#### 1.2 Policy Coverage and Application

This policy applies to all University entities that directly or indirectly handle personal data of all University members (faculty, staff, students) and others who have a contractual or statutory relationship with the University. The provisions of this policy do not apply in the following cases:

- To fulfill legal requirements under applicable laws, regulations, and policies.
- To meet judicial requirements.
- To fulfill obligations under agreements to which the Kingdom is a party.
- To protect health, public safety, or the vital interests of individuals.

## 1.3 Policy Review Schedule

This policy should be reviewed regularly, at least once annually, according to the guidance of the policy's overall supervisor.

## 1.4 Compliance Monitoring



Compliance with the Personal Data Protection Policy is measured according to the standards and performance indicators set by the University's Data Management Office, in alignment with the requirements of the National Data Management Office. Compliance standards are periodically reviewed by the Director of the Data Management Office.

## 1.5 Roles and Responsibilities Matrix

| Supervisory Committee          | Responsible for approving the policy and plans, and making decisions to resolve issues and handle escalation cases.   |  |
|--------------------------------|---|--|
|                                | The Data Governance Unit Office is the entity responsible for preparing the University's Personal Data Protection Policy and related procedures in alignment with the directives of the National Data Management Office, including:   |  |
| Data Governance Unit<br>Office | <ul> <li>Preparing and updating the Personal Data Protection Policy.</li> <li>Preparing, updating, and approving the Privacy Notice for use by business departments that handle personal data.</li> <li>Supervising the identification of personal data handled by the University in collaboration with business departments.</li> <li>Approving the plan and mechanism for implementing the Personal Data Protection Policy.</li> <li>Preparing compliance reports regarding the University's Personal Data Protection Policy for stakeholders.</li> <li>Developing awareness programs to raise knowledge and promote a culture of personal data protection.</li> <li>Reviewing requests for data sharing submitted by various entities, directing them to business data representatives, and verifying that the requested data is properly classified.</li> </ul> |  |
| Business Directories           | Implementation of the Personal Data Protection Policy through:  • Collaborating with the Data Management Office to identify the reference sources of personal data within the University.   |  |



|   | Complying with the Personal Data Protection Policy and Privacy Notices.   |
|---|---|
| Strategy Sector (Deanship of Development and Quality) | Responsible for reviewing and updating contracts, service level agreements, and operational agreements in accordance with the privacy policies and procedures approved by the entity's senior management.   |
| Deanship of Information<br>Technology                 | The IT departments are responsible for implementing the policy provisions across all systems and databases.   |
| Cybersecurity Department                              | Responsible for identifying, documenting, and approving cybersecurity requirements related to the protection of personal data, in alignment with the directives of the National Cybersecurity Authority. This includes:  • Monitoring and auditing the implementation of protection controls on personal data.  • Preparing reports for stakeholders and managing escalations regarding the application of protection controls on personal data, and sharing these reports with the Data Management Office. |
| Risk Management                                       | Responsible for assessing the risks and potential impacts of personal data processing activities, determining the acceptable level of risk, approving it at the University level, and sharing the assessment results with the Municipal Data Office and sector stakeholders.  |
| Legal Department                                      | Responsible for providing consultations regarding notices or issues related to personal data breaches, reviewing the legal wording of privacy notices and contracts, and advising on data subjects' rights  |