



UGANDA
KEY POPULATIONS
CONSORTIUM

PRIVACY POLICY

Policy version: 1.1

Table of Contents

| | |
|---|----|
| 1. Introduction | 2 |
| 2. Information About Us | 3 |
| 4. Personal data we collect about you | 3 |
| 5. How your personal data is collected | 4 |
| 6. How and why we use your personal data | 4 |
| 7. Job Applicants | 8 |
| 8. Website Information | 8 |
| 9. Content | 9 |
| 10. Information Collected at our Premises | 9 |
| 11. Legal Claims | 10 |
| 12. Information we receive from third parties | 10 |
| 13. Special Category Data | 11 |
| 14. Sharing your Data | 11 |
| 15. Where we store your information | 12 |
| 16. Data Security | 12 |
| 17. How long will we keep your information? | 13 |
| 18. Your Rights | 13 |
| 19. Changes to this Policy | 14 |

1. Introduction

At UKPC, we care about the privacy of the people who use our Services and interact with us, and this policy explains how we deal with the personal information that you give us.

This policy applies to all interactions you may have with UKPC, for example visiting our website, using our systems (such as our free wifi), attending any of our meetings, trainings or conferences, or visiting our office premises. Depending upon which of our Services you use or how you contact us, we may also need to provide you with additional information about the use of your personal information – this extra information shall always be availed to you before we collect any of your data.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our services. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the Data Protection and Privacy Act, 2019.

Given the nature of our website, we do not expect to collect the personal data of anyone under 18 years of age. If you are aware that any personal data of anyone under 18 years of age has been shared with us, please let us know so that we can delete that data.

This version of our privacy policy is primarily written for adults, including parents and guardians of child users. **If you are a child (under 18 years old) you are welcome to read this policy if you find it useful, but we recommend you seek guidance from your guardian before you provide any information to us so that all information is provided under the supervision of an Adult.**

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of Uganda
- Cookies and other tracking technologies
- Your rights
- Keeping your personal data secure

- How to complain
- Changes to this privacy policy
- How to contact us
- Do you need extra help?

This privacy policy relates to your use of all UKPC services

2. Information About Us

We are Key Populations Consortium Uganda Limited (UKPC) (registered company number: 8020002717942), Registered office is: 4th Floor, AHA Towers, Plot 7 Lourdel Road, Kampala, Uganda

If you have any questions, our contact details are:

4th Floor, AHA Towers, Plot 7 Lourdel Road, Kampala, Uganda

+256 312 531 612

info@ugandakpc.org

We also have a dedicated Data Protection Officer, who is responsible for data compliance issues. Their contact details are below:

+256 759 440 309

compliance@ugandakpc.org

3. What this policy applies to

This privacy policy relates to your use of all UKPC services.

The personal data We collect about you depends on the particular activities carried out through any of the services We offer and the activities We conduct. We will collect and use the following personal data about you:

4. Personal data we collect about you

The personal data we collect about you depends on the particular activities and services you take part in or access. We will collect and use the following personal data about you:

- your name, address and contact information, including email address and telephone number
- information to check and verify your identity, eg date of birth
- your gender, (if you choose to give this to us)

- location data, (if you choose to give this to us)
- your billing information, transaction and payment card or other payment method information, **(if you choose to donate to Us**
- bank account and payment details, **(if We are to make any payments to you)**
- details of any information, feedback or other matters you give to us by phone, email, post or via social media
- your activities on, and use of, our website
- information about the services we provide to you
- information about how you use our website and technology systems
- your responses to surveys, questionnaires

You shall be required to provide us with your personal data as requested for a particular service or activity unless we tell you that you have a choice.

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on the use and access of Our services.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

We collect personal data from you:

5. How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register with us, participate in a research activity, contact us (including via email), send us feedback, donate, post material to our website and complete surveys or questionnaires, and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explain in the section on '**Cookies and other tracking technologies**'.

6. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations

- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

| What we use your personal data for | Our reasons |
|---|--|
| Create and manage your registration with Us | For our legitimate interests, ie to be as efficient as we can so we can deliver the best services to you OR To perform our contract with you or to take steps at your request before entering into a contract |
| Providing services to you | To perform our contract with you or to take steps at your request before entering into a contract |
| Conducting checks to identify you and verify your identity | To comply with our legal and regulatory obligations |
| To enforce legal rights or defend or undertake legal proceedings | Depending on the circumstances: <ul style="list-style-type: none"> • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests, ie to protect our interests and rights |
| Customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website | Depending on the circumstances: <ul style="list-style-type: none"> • your consent as gathered by the separate cookies tool on our website • where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient |

| What we use your personal data for | Our reasons |
|---|--|
| | <p>as we can so we can deliver the best services to you</p> <p>If you have provided such a consent you may withdraw it at any time by changing the setting on the cookies tool and add appropriate links (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p> |
| <p>Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended</p> | <p>Depending on the circumstances:</p> <ul style="list-style-type: none"> ● your consent as gathered <i>by the</i> separate cookies tool on our website ● where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you <p>If you have provided such a consent you may withdraw it at any time (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p> |
| <p>Communications with you not related to marketing, including about changes to our terms or policies or newsletters or other important notices</p> | <p>Depending on the circumstances:</p> <ul style="list-style-type: none"> ● to comply with our legal and regulatory obligations ● in other cases, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you |
| <p>Protecting the security of systems and data used to provide the services</p> | <p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect</p> |

| What we use your personal data for | Our reasons |
|--|---|
| | criminal activity that could be damaging for you and/or us |
| Statistical analysis to help us understand our member base | For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you |
| Updating and enhancing member records | Depending on the circumstances: <ul style="list-style-type: none"> ● to perform our contract with you or to take steps at your request before entering into a contract ● to comply with our legal and regulatory obligations ● where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our members about existing and new developments affecting Our Community |
| Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our activities and services, eg to record and demonstrate evidence of your consents where relevant | To comply with our legal and regulatory obligations |
| The audit of our information management systems | For our legitimate interests, ie to maintain our accreditations so we can demonstrate we operate at the highest standards |
| <p>To share your personal data with members and third parties that may perform some of our obligations (and professional advisors acting on our or their behalf) in connection with a significant transaction</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p> | Depending on the circumstances: <ul style="list-style-type: none"> ● to comply with our legal and regulatory obligations ● in other cases, for our legitimate interests, ie to protect, realise or grow the value in the services we provide |

7. Job Applicants

We will collect and hold information on job applicants, including information you provide to us in your application, or provided to us by recruitment agencies, as well as information on you from any referees you provide.

We use this as necessary to enter into an employment contract with you, and for our legitimate interests in evaluating candidates and recording our recruitment activities, and as necessary to exercise and perform our employment law obligations and rights.

If you are successful in your application, your information will be used and kept in accordance with our internal privacy notice. If you currently work for us, or used to work for us, you can request a copy of this from us. If you are not successful in your application, your information will be held for up to 6 months after the relevant round of recruitment has finished.

You must provide certain information (such as your name, contact details, professional and educational history) for us to consider your application fully. If you have not provided all of this information, we may contact you to ask for it. If you do not wish to provide this information, we may not be able to properly consider your application.

If you are listed as a referee by an applicant, we will hold your name, contact details, professional information about you (such as your employer and job title) and details of your relationship with the applicant. We will use this information as necessary for our legitimate interests in evaluating candidates and as necessary to exercise and perform our employment law obligations and rights. Your information will be kept alongside the applicant's information.

If you are listed as an emergency contact by someone who works for us, we will hold your name, contact details and details of your relationship with that worker. We will use this to contact you as necessary to carry out our obligations under employment law, to protect the vital interests of that worker, and for our legitimate interests in administering our relationship with that worker. Your information will be kept until it is updated by that worker, or we no longer need to contact that worker after they have stopped working for us.

8. Website Information

We may collect information about you and your use of our website via technical means such as cookies, webpage counters and other analytics tools. We use this as necessary for our legitimate interests in administering our website and to ensure it operates effectively and securely.

For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

We keep this website information about you from when it is collected until the relevant cookie expires.

Our website may, from time to time, contain links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Our website contains contact forms where you provide your personal data in order to download content or raise queries with us. We keep this data in our web database for one month.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy

9. Content

This is information about you which you provide when you post content on our website. This may include reviews, photographs, videos and other content which you post on our website.

We may display and publish this information on our platforms as part of our contract with you or as necessary for our legitimate interests in providing content to our users.

This information is kept for as long as you have an account with us and may be retained and displayed indefinitely after you close your account. We are able to remove or delete any content which you post at any time on your request.

You may add information on your membership activities on our website. This information is maintained provided your membership with Us is still active, until the same is revoked or the relationship comes to an end upon which it shall be removed within three months from the time your consent is revoked.

10. Information Collected at our Premises

Visitor information. We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. If you have an accident at our premises, this may include an account of your accident. (For purposes of clarity, the definition of premises extends to any venues that may be rented for UKPC for purposes of conducting our business-like conferences, trainings, seminars or workshops)

CCTV. We, or our building management company, may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes.

We use this information as necessary for our legitimate interests in administering your visit, ensuring site security and visitor safety, and administering parking.

Visitor information is kept for a period of up to 3 months. If you have an accident on our premises, our accident records are retained for a period of up to 3 years

CCTV recordings may be kept for a period of up to 35 days (unless there an incident occurs and it is necessary for us to keep recordings for longer to properly deal with it).

Events. If you attend any event organised by us including conferences and seminars, any photographs and videos recorded may be used in our publications and website.

11. Legal Claims

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim.

12. Information we receive from third parties

We may also receive information about you from the following sources:

- Our service providers. We work closely with third parties (including, for example, partners, members, sub-contractors in technical, payment and delivery services research firms, analytics providers, search information providers and credit reference agencies) who may provide us with information about you, to be used as set out above.
- **Members.** If an entity becomes a member of UKPC, and originally held your information, we will hold and use the information you provided to them, or which they otherwise held about you, in accordance with this privacy notice.
- **Our other channels.** This is information we receive about you if you use any of the other websites we, our members or our partners operate, or the other services or activities we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this website. We will

also have told you for what purpose we will share and combine your data. If you have filled in an online survey for our benefit then we may keep this data for up to two years.

- **Publicly available sources.** We obtain information from the following publicly available sources: your employer website, your regulatory body, URSB, NGO Bureau or LinkedIn.

13. Special Category Data

We may also collect and use the following “special categories” of more sensitive personal information in the following situations:

- Information you provide about your dietary requirements in the booking process for an event may contain reference to religion but are only stored for the purpose of providing appropriate food and beverage.
- Information you provide about your health, including any medical condition, health and sickness records for the purposes of ensuring access at any of our events or to provide you with the necessary support as part of our services

Where we collect “special categories” of particularly sensitive personal information this information requires higher levels of protection and by law we need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, when you have provided the data.
- Where we collect “special categories” of medical information, we retain this for one month or where the purpose for which the data was collected has been achieved or lapsed.

14. Sharing your Data

As well as any sharing listed above, we may also share your information with third parties, including third-party service providers and other entities in our group. Third parties are required to respect the security of your personal information and to treat it in accordance with the law. We never sell your data to third parties.

- We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our members, or others or where we have another legitimate interest in doing so. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. Where we run events in conjunction with a partner organisation we may share your data with that organisation - we will always inform you of data sharing activities.
- We also may need to share your personal information for third-party service providers (including contractors and designated agents) so that they can carry out their services.

- The following activities are carried out by third-party service providers: event administration and management, technology systems, event venues, feedback and review platforms, research services, IT services, legal advice, learning management systems, printers and mailing houses, payment processing systems and direct debit systems, quality assurance consultants, trainers and speakers at events, training partners, recruitment agencies and webinar platforms.
- **Safety and Security.** All our third-party service providers are required to take appropriate security measures to protect your personal information. Where third parties process your personal information on our behalf as “data processors” they must do so only on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- We may share your personal information with other third parties, for example in the context of the possible restructuring of UKPC where necessary in connection with the purposes which your information was collected for. We may also need to share your personal information with a regulator or to otherwise comply with the law.

15. Where we store your information

Our office headquarters are based in Kampala and our main data centre is located in Kampala, Uganda. However, where required to perform our contract with you or for our wider business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside Uganda. It may also be processed by staff operating outside Uganda who work for us or for one of our service providers.

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice.

Some countries or organisations outside Uganda which we may transfer your information to will have an “adequacy decision” in place, meaning the Personal Data Protection Office (PDPO) considers them to have an adequate data protection regime in place.

If we transfer data to countries or organisations outside Uganda which the PDPO does not consider having an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by the PDPO) are put in place where required. To obtain more details of these safeguards, please contact us.

16. Data Security

As well as the measures set out above in relation to sharing of your information, we have put in place appropriate internal security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

17. How long will we keep your information?

We have set out above indications of how long we generally keep your information. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

18. Your Rights

The Data Protection and Privacy Act gives you a number of rights when it comes to personal information, we hold about you. The key rights are set out below. More information about your rights can be obtained from the Personal Data Protection Office (PDP)). Under certain circumstances, by law you have the right to:

- **Be informed** in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- **Request access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal information** that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information**. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also

have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information** to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- **Withdraw consent.** In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in Uganda, this will be the PDPO). If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please contact us at compliance@ugandakpc.org.
- **No fee usually required.** You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **What we may need from you.** We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- **Timescale.** Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

19.Changes to this Policy

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice