

Kulika Uganda

DATA PROTECTION POLICY

July 2024

1 Policy Statement

Kulika Uganda engages in activities that require personal data to be generated and this include Monitoring and Evaluation and program related research. Kulika Uganda is committed to safeguarding the privacy and security of personal data in compliance with national and international data protection regulations. This policy outlines how we collect, use, disclose, and protect personal information. We adhere to the Uganda Data Protection and Privacy Act, 2019, the General Data Protection Regulation (GDPR), and other applicable laws.

Why this policy

Protecting personal data is crucial for maintaining trust and confidence of beneficiaries, employees, partners, donors and other stakeholders. This policy demonstrates our commitment to data protection and privacy ensuring that we comply with legal requirements and the highest standards of integrity and confidentiality in all our activities.

Who is covered by this policy

This policy applies to the employees, beneficiaries, partners, donors and other stakeholders. It covers safe collection, storage, processing, sharing and disposal of data within Kulika Uganda.

2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Data Subject:** An individual whose personal data is processed.
- **Processing:** Any operation performed on personal data, such as collection, recording, storage, modification, retrieval, and dissemination.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** The entity that processes personal data on behalf of the Data Controller.

3. Data Collection

Types of Data Collected

The following will be the types of personal data that will be collected from time to time:

- Contact information (name, address, phone number, email)
- Demographic information (age, gender, occupation)
- Educational and professional background
- Financial information
- Health information (if relevant for services provided)
- Agricultural information
- Land ownership

- Visual data including pictures/photos, videos

Methods of Data Collection

Data will be collected through various means, including:

- Direct interactions (e.g., registration forms, surveys)
- Online platforms (e.g., website, social media)
- Third-party sources (e.g., partner organizations)

4. Legal Basis for Processing

Kulika Uganda will process personal data based on one or more of the following legal grounds:

- Consent: Where the data subject has given explicit consent through written or verbal (recorded).
- Contract: Where processing is necessary for the performance of a contract.
- Legal Obligation: Where processing is required to comply with a legal obligation.
- Legitimate Interests: Where processing is necessary for the legitimate interests of Kulika Uganda or a third party, provided these interests do not override the data subject's rights.

5. Use of Personal Data

Personal data will be used for the following purposes:

- To provide and improve our services
- To communicate with data subjects
- To comply with legal and regulatory requirements
- For research and development
- To protect the rights, property, or safety of Kulika Uganda, our clients, or others

6. Data Sharing and Disclosure

Kulika Uganda will share personal data with third parties under the following circumstances:

- With service providers and partners who assist in our operations
- When required by law or legal process
- To protect the rights and safety of Kulika Uganda, our clients, or the public
- With consent from the data subject

7. Data Security

Kulika will adhere to implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, and destruction. These measures include:

- Encryption of sensitive data
- Regular security assessments
- Access controls and authentication mechanisms
- Employee training on data protection

8. Data Retention

Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law. We will periodically review data retention practices to ensure compliance with organizational policies and legal obligations.

9. Data Subject Rights

Data subjects will have the following rights under applicable data protection laws:

- Right to Access: To obtain a copy of their personal data.
- Right to Rectification: To correct inaccurate or incomplete data.
- Right to Erasure: To request deletion of their data.
- Right to Restrict Processing: To limit the processing of their data.
- Right to Data Portability: To receive their data in a structured, commonly used format.
- Right to Object: To object to the processing of their data based on legitimate interests.

10. International Data Transfers

Where personal data is transferred outside Uganda, we will ensure that appropriate safeguards are in place to protect the data in accordance with this policy and applicable laws. These safeguards will include and not limited to:

- Standard Contractual Clauses
- Binding Corporate Rules
- National data protection laws and regulations

11. Reporting

Management will report annually to the Board on implementation of this policy.

12. Policy Review

The policy will be regularly updated to remain current. The review will be done once a year.

Executive Director:

Name.....Signed.....Date.....

Human Resource and Administration Officer:

Name.....Signed.....Date.....

Staff Member:

Name.....Signed.....Date.....