



BACKUP UGANDA

Privacy Policy

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Introduction

This Privacy Policy has been designed in response to the European Union's General Data Protection Regulation coming into force on 25 May 2018 and Uganda's Data Protection and Privacy Act 2019. The Policy is to be implemented by all employees, volunteers and directors of the organization. It is leading in all situations where personal data of citizens of Uganda and the European Union are collected and saved.

All workers at all levels are expected to familiarize themselves with this Privacy Policy and stay informed about possible amendments. Amendments will be communicated by the Uganda Country Director and/or the Board President. The Policy is not to be photocopied or distributed in any other way unless the Country Director and/or the Board President has given prior approval.

Access to the Privacy Policy

- This Privacy Policy is to be shared with all employees, volunteers and directors of the organization, who are to be sensitized and trained on its use at least once per year;
- The Policy is to be accessible through the organization's website as well. The file is to be available there and is to be explained in understandable terms in the form of a privacy statement. All this is to be available on a specific Privacy Page;
- The Policy is to be shared with everyone who signs up for the newsletter, through a reference to the Privacy Page on the organization's website;
- Donors who make donations to Backup Uganda are to be informed about the Privacy Page through email when possible, as well as via a reference to the Privacy Page on the Donate Page of the website. The same goes for donors in the Netherlands who enter an ANBI agreement;
- Changes in the way we do our work that have an effect on the way we handle personal data are to be included in this Privacy Policy immediately, and are to be communicated to everyone involved through the organization's website, social media pages and email.

Collecting and saving personal data

- Personal data of EU citizens are only allowed to be collected and saved by the organization when related to sending newsletters, receiving donations, recruitment and employment;
- Personal data of Ugandan citizens are only allowed to be collected and saved by the organization when related to recruitment and employment, project activities, office visits and donations;
- Personal data are only to be collected and saved when reasonable or necessary to achieve the goal of interaction with the organization;
- No data beyond identifiers, sensory data, educational information, professional/employment-related information and inferences drawn from other personal data to create individual profiles are allowed to be collected and saved;

- Identifiers allowed to be collected from employees include names, nationalities, dates of birth, email addresses, phone numbers, bank account names & numbers, NINs, NSSF numbers and TINs. These are allowed to be used for recruitment, remuneration and communication purposes;
- Sensory data that are allowed to be collected from employees include audio, visual and audiovisual data. These are allowed to be used – with explicit permission from individual employees – for general communication and promotion of the organization’s work, for the community podcast and for reporting;
- Educational information that is allowed to be collected from employees include educational level and qualifications. This information can only be used for recruitment;
- Professional or employment-related information that is allowed to be collected from employees includes performance reviews and disciplinary actions. This information is allowed to be used for performance evaluation. While the specific details of disciplinary actions may not be shared with external parties, it is permitted to make a reference to the existence of disciplinary actions when a potential employer formally requests for a reference related to a former or current employee;
- Identifiers allowed to be collected from clients include names, ages, phone numbers and email addresses. These are allowed to be used for communication and reporting/measuring project outputs;
- Sensory data allowed to be collected from clients include audio, visual and audiovisual data. These are allowed to be used – with explicit permission from clients – for general communication and promotion of the organization’s work, for the community podcast and for reporting;
- Education information that is allowed to be collected from clients includes learning progress. This information is allowed to be used towards the development of individualized support plans (ISPs) for learners;
- Inferences drawn from other personal data to create individual profiles that are allowed to be collected from clients include disabilities, behavior, attitudes, learning abilities and learning needs. These are allowed to be used towards the development of ISPs for learners;
- Identifiers allowed to be collected from visitors and guests include names, phone numbers and email addresses. These are allowed to be used for further communication related to the organization’s work;
- Identifiers allowed to be collected from individual donors include names and email addresses. These are allowed to be used to process donations and to share updates about the organization’s work in relation to their donations;
- Personal data are only to be saved when these are shared with the organization of own accord;
- Personal data are to be kept by the organization for a maximum of 5 years after active interaction with the organization has ceased, unless the person involved requests to remove these earlier.

Through MailChimp:

- Through Mailchimp, at subscription it is allowed to collect and save at minimum an email address and at maximum a name and email address;
- These data are to be used for sharing the monthly newsletter only;

- Backup Uganda and MailChimp have signed a data processing agreement to protect the data saved.

Through GlobalGiving:

- When making a donation, GlobalGiving requests for specific personal information and stores these;
- GlobalGiving is solely responsible for saving and protecting its users' personal data;
- GlobalGiving offers the possibility to make an anonymous donation - Backup Uganda workers are to refer to this option when requested for by a donor;
- Backup Uganda has - when shared - access to names and email addresses of donors. These are to be used solely to thank donors for their donations and to share a quarterly update on the project that was donated to. Backup Uganda will not store these data outside its password protected GlobalGiving account.

Through other donations:

- Personal data of donors who make direct donations to a bank account or mobile money account in name of Backup Uganda are allowed to be kept by the organization - name and, when possible, email address only;
- These data are to be used solely to thank donors and to update them on possible new campaigns;
- When entering an ANBI agreement, the personal data that are provided by the donor in writing are kept by the Treasurer of Backup Uganda's Board.

Through the website:

- Backup Uganda's website does not automatically collect data from visitors, cookies are not to be used.

Protecting personal data

- All collected personal data are to be stored and protected by Backup Uganda's employees and the Board Treasurer. A Personal Data Protection Officer is to be in place within the Uganda team at all times to take overall responsibility for person data protection, as communicated to the Personal Data Protection Office in Uganda;
- Personal data can only be kept in an online environment if it is password protected. Personal data are to be kept offline in encrypted files, solely on computers used by Backup Uganda's Board Treasurer and Backup Uganda employees;
- At all times a backup of all files with personal data are to be kept on an encrypted external storage device;
- Files with personal data are generally not to be printed. In case this is necessary, these documents are to be kept in files that are solely accessible to Backup Uganda employees and/or the Treasurer;
- All personal data stored in print in Uganda is kept at Backup Uganda's office, which is only accessible to employees and is secured by a formalized security company 24/7;
- Written ANBI agreements are to be kept in a file that is solely accessible to the Treasurer;
- Passwords that give access to files with personal data are to be chosen with care and changed regularly;



Gulu, Uganda / Zwolle, The Netherlands

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- Donors are to be informed that personal data shared through GlobalGiving fall within GlobalGiving's responsibilities; Personal data are allowed to be kept for as long as needed to maintain a specific interaction between the person involved and the organization. When this interaction ends, the personal data are allowed to be kept for a maximum of 5 years, unless the person involved requests for a removal of the data earlier;
- In case of a data breach that includes the likelihood of unauthorized individuals being able to access personal data, the Dutch Data Protection Authority or the Personal Data Protection Office in Uganda – depending on the citizens whose data are involved – is to be informed within 72 hours. All individuals who are possibly involved are to be informed as well.

Adjusting (the use of) personal data

- Individuals have the right to access their personal data kept by the organization at all times;
- Individuals have the right to adjust their personal data at all times;
- Individuals have the right to request the organization to no longer use and/or keep their personal data at all times. A request like this is to be implemented immediately;
- Changes in (the use of) personal data are to be communicated through info@backupuganda.org;
- Unsubscribing to the newsletter is to be done through the link at the bottom of the most recent newsletter;
- Complaints about the way the organization is handling personal data are to be taken up immediately. Individuals are requested to share such complaints through info@backupuganda.org. In addition, individuals have the right to file a complaint with any authority that is authorized to receive such complaints.