Site 99 UG LTD – Data Protection Policy

Document owner: Technical Lead / Data Protection Officer, Site 99 UG LTD
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Approved by: Board of Directors

1. Purpose

This policy sets out how Site 99 UG LTD ("Site 99", "we", "us") collects, uses, stores, shares and disposes of personal data, and how we meet our obligations under the Data Protection and Privacy Act, 2019 of Uganda, the Data Protection and Privacy Regulations, 2021, and any other applicable law. It is written to protect the people whose data we handle and to give our staff clear rules to follow.

2. Scope

This policy applies to all directors, employees, interns, contractors, freelancers and partners who handle personal data on behalf of Site 99, in any format (digital or paper), and on any system or device, including our website (site99ug.com), client portals, cloud tools, email, messaging apps and shared drives.

3. About Site 99

Site 99 UG LTD is a digital collective based in Kampala, Uganda, providing software and systems development, branding, content creation and related digital services to businesses and organisations. In the course of this work we act in two capacities:

- **Data controller / data collector:** for personal data we collect for our own purposes, such as staff, job applicants, website visitors, leads, clients' contact persons and suppliers.
- **Data processor:** for personal data we handle on behalf of clients, for example when we build or host systems such as school, clinic, salon, transport or farm management platforms that store our clients' customers' or members' data. In this role we act only on the client's documented instructions and under a written agreement.

4. Definitions

- **Personal data:** any information about an identifiable person, such as name, phone number, email, address, ID number, photo, voice, location, online identifiers or financial details.
- **Special personal data:** data about a person's religious or philosophical beliefs, political opinions, sexual life, financial information, health status or medical records, or other data the law treats as sensitive. Data of children is also

treated with extra care.
- **Data subject:** the person the data is about.
- **Processing:** anything done with data, including collecting, recording, storing, using, sharing, deleting.
- **PDPO:** the Personal Data Protection Office, hosted by the National Information Technology Authority – Uganda (NITA-U).
- **DPO:** the Data Protection Officer appointed by Site 99.

5. Data protection principles

All processing at Site 99 must follow these principles:

1. **Accountability:** we take responsibility for compliance and can demonstrate it.
2. **Fair and lawful processing:** we have a lawful basis, and we are honest with people about what we do.
3. **Purpose limitation and minimality:** we collect only what is necessary, adequate and relevant for a specified purpose, and do not use it for incompatible purposes.
4. **Retention limitation:** we keep data only as long as needed for the purpose or as required by law.
5. **Accuracy:** we keep data complete and up to date and correct errors promptly.
6. **Transparency:** we tell people who we are, why we collect their data, who we share it with and what their rights are.
7. **Security safeguards:** we protect data with appropriate technical and organisational measures (see our Information Security Policy).
8. **Respect for data subject rights:** we honour access, correction, objection and deletion requests.

6. Lawful bases for processing

We process personal data only where at least one of the following applies: the person has given consent; processing is necessary to perform a contract with them or take steps at their request; we must comply with a legal obligation; processing is needed to protect someone's vital interests; or it is necessary for a legitimate purpose that does not override the person's rights. Consent must be freely given, specific, informed and recorded, and can be withdrawn at any time.

7. Categories of personal data we handle

Category	Examples	Typical purpose
Staff and contractors	Name, contact details, NIN, bank/mobile money details, CVs, contracts	Employment, payroll, legal compliance
Job applicants	CVs, references, interview notes	Recruitment
Clients and prospects	Contact person names, emails, phone numbers, NIN, company details, correspondence	Sales, contracting, service delivery, invoicing
Website visitors and leads	Name, email, phone, enquiry content, cookies and analytics identifiers	Responding to enquiries, improving our site
Client-system end users (as processor)	Student, patient, customer, member or passenger records held on systems we build or host	Providing the client's service on their instructions
Content and media participants	Photos, video, voice, names of people featured in shoots	Content production, with consent or releases
Suppliers and partners	Contact and payment details	Procurement, payment

Special personal data (for example health or children's data in a clinic or school system) is handled only where a client has a lawful basis and instructs us to, with stricter access controls and logging.

8. Collecting data and notices

When we collect personal data directly, we provide a privacy notice stating: who we are and how to contact the DPO; what data we collect and why; the lawful basis; who receives the data; whether it will be transferred outside Uganda; how long we keep it; the person's rights; and how to complain. Forms on our website and client portals must link to our Privacy Notice. Where we collect data on behalf of a client, the client is responsible for the notice unless our contract says otherwise, and we will build notice and consent features into their systems on request.

9. Consent for photos, video and content

We obtain written or recorded consent (a release) before publishing identifiable images, video or audio of people. For children, consent is obtained from a parent or guardian. Consent can be withdrawn and we will remove content from channels we control within a reasonable time.

10. Data subject rights

People have the right to be informed; to access their personal data; to request correction of inaccurate or incomplete data; to request deletion or destruction of data we are no longer authorised to hold; to object to or restrict processing, including direct marketing; and to withdraw consent. The right to complain to the PDPO is also protected.

Procedure:

1. Requests may be made by email to office@site99ug.com or through site99ug.com The DPO logs the request, verifies the requester's identity and responds within **30 days** (or sooner where the law requires).
2. If the request concerns data we hold as a processor, we pass it to the client controller promptly and assist them to respond.
3. We keep a record of each request, the decision and the response.

11. Data sharing and disclosure

We share personal data only where necessary and lawful, with: service providers who help us operate (hosting, cloud storage, email, payment, analytics), under written agreements requiring confidentiality and security; clients, where we are producing work for them; professional advisers; and regulators, courts or law enforcement where legally required. We never sell personal data. Every third-party processor is

vetted before use and listed in our register of processors.

12. Cross-border transfers

Some of our tools and hosting providers store data outside Uganda. We transfer personal data abroad only where the destination country or recipient has adequate data protection safeguards or where the person has consented, and we document the transfer, the safeguards used and the provider. Clients are told which hosting regions their systems use.

13. Retention and disposal

Data	Retention
Staff records	Duration of employment plus 7 years, or as required by law
Unsuccessful job applicants	12 months, unless consent to keep longer
Client contracts and invoices	7 years after the relationship ends
Leads and enquiries	24 months from last contact
Client-system data (processor)	As set out in the client agreement; returned or deleted within 60 days of termination on instruction
Content shoot releases and raw media	For the life of the licensed use, then archived or deleted
System and access logs	12 months

When data is no longer needed it is securely deleted from systems and backups on the normal backup cycle, and paper records are shredded. Retention periods are

reviewed annually.

14. Processing on behalf of clients

Where Site 99 acts as a processor, we: process data only on the client's written instructions; sign a data processing agreement or include equivalent clauses in the service contract; keep client data logically separated; allow only authorised personnel to access it; notify the client without undue delay after any breach; help the client respond to data subject requests; and return or delete the data at the end of the contract.

15. Privacy by design and data protection impact assessments

For every new system, feature or service that involves personal data, particularly health, children's, financial or large-scale data, the project lead completes a short data protection impact assessment (DPIA) before launch. Systems are designed to collect the minimum data, apply role-based access, encrypt sensitive fields, log access and make deletion possible.

16. Personal data breaches

A personal data breach is any accidental or unlawful loss, destruction, alteration, unauthorised disclosure of or access to personal data.

1. **Report immediately:** anyone who suspects a breach must tell the DPO at once (see the Incident Response section of the Information Security Policy).
2. **Contain and assess:** the DPO and technical lead stop the breach, assess the data and people affected, and the risk of harm.
3. **Notify the PDPO** within the time required by the Regulations (currently 48 hours of becoming aware) where the breach is reportable, and notify affected individuals without delay where there is a risk to their rights.
4. **Notify clients** immediately where we are the processor.
5. **Record and learn:** every breach is entered in the breach register with cause, impact, actions taken and lessons learned.

17. Roles and responsibilities

- **Board / Managing Director:** approves this policy, provides resources and is

ultimately accountable.
- **Data Protection Officer:** Rwihura Eineamaani - +256 741760769. Monitors compliance, advises staff, handles requests and breaches, liaises with the PDPO, maintains registers and delivers training.
- **Technical Lead:** implements security controls for systems and hosting.
- **Project leads:** ensure DPIAs, contracts and consent features are in place for their projects.
- **All staff and contractors:** follow this policy, complete training, protect data and report incidents and concerns immediately.

18. Training and awareness

All new staff and contractors receive data protection induction before accessing personal data, and everyone completes refresher training at least once a year. Attendance is recorded.

19. Records we maintain

The DPO keeps: a register of processing activities; a register of third-party processors and international transfers; records of consents; a log of data subject requests; DPIAs; a breach register; training records; and copies of our PDPO registration.

20. Registration with the PDPO

Site 99 is registered, or has applied to be registered, with the Personal Data Protection Office as a data controller / data processor. Our registration details are kept by the DPO and renewed as required.

21. Monitoring, compliance and discipline

The DPO reviews compliance at least annually and reports to management. Breaches of this policy by staff may lead to disciplinary action, up to termination, and for contractors, termination of the engagement. Serious violations may also carry criminal or civil liability under the Act.

22. Complaints

Anyone who believes we have mishandled their personal data may contact our DPO

at office@site99ug.com. We will acknowledge within 5 working days and aim to resolve within 30 days. They also have the right to complain directly to the Personal Data Protection Office.

23. Review of this policy

This policy is reviewed at least every 12 months and whenever the law, our services or our risks change materially.

22. Contacts

Site 99 UG LTD, Kampala, Uganda – site99ug.com Data Protection Officer: Rwihura Eineamaani - +256 741 760 769

23. Approval

This policy was approved by the management of Site 99 UG LTD on the date below.

Name	Title	Signature	Date
Rwihura Eineamaani	Co-Founder		1st July, 2026
Tameem Kangave	Co-Founder		1st July, 2026

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