



Data Privacy Policy

1.1 Purpose

Japotech Solutions Uganda Limited ("Japotech," "we," "our," or "us") is committed to protecting the privacy and security of all Personal Data we process in accordance with the **Uganda Data Protection and Privacy Act, 2019 (DPPA)** and other applicable laws. This Data Privacy Policy ("Policy") explains how we collect, use, disclose, store, and protect the Personal Data of our clients, employees, suppliers, website visitors, and all other data subjects ("you" or "your").

1.2 Application

This Policy applies to all Japotech operations, employees, contractors, and third-party partners who handle Personal Data on our behalf. It covers data collected through our services, websites, mobile applications, contracts, and all other interactions.

2. Definitions

- a) **Personal Data:** Any information relating to an identified or identifiable natural person, as defined under the DPPA. This includes, but is not limited to: names, identification numbers, location data, online identifiers, email addresses, phone numbers, financial information, and CCTV footage.
- b) **Sensitive Personal Data:** A special category requiring higher protection, including data revealing racial/ethnic origin, political opinions, religious beliefs, health status, sexual life, biometric data, or genetic data. Japotech will only process this data with explicit consent or where legally mandated.
- c) **Processing:** Any operation performed on Personal Data, including collection, recording, storage, use, disclosure, or destruction.
- d) **Data Subject:** The individual to whom the Personal Data relates.
- e) **Data Protection Officer (DPO):** The designated person responsible for overseeing data protection compliance at Japotech.

3. Principles of Data Processing

We adhere to the core data protection principles, ensuring Personal Data is:

- a) **Processed Lawfully, Fairly, and Transparently.**
- b) **Collected for Specified, Explicit, and Legitimate Purposes** and not further processed in a manner incompatible with those purposes.
- c) **Adequate, Relevant, and Limited** to what is necessary for the purposes for which it is processed.
- d) **Accurate and, where necessary, kept up to date.**
- e) **Kept in a form which permits identification of data subjects for no longer than is necessary** for the purposes.
- f) **Processed in a manner that ensures appropriate security**, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

4. How We Collect & Use Personal Data (Purposes)

Data Category	Source of Collection	Purpose of Processing	Legal Basis
Client/Prospect Data (Contact details, project specifics, communication records).	Direct interactions, contracts, website forms.	Service delivery, project management, billing, support, marketing (with consent).	Contract performance, Legitimate interest, Consent.
Employee Data (Full identity, NSSF/NIN, bank details, CV, performance records).	Job applications, employment contracts, HR processes.	Recruitment, payroll, performance management, legal compliance.	Contract performance, Legal obligation.
Supplier/Contractor Data (Company/contact details, service agreements, payment info).	Procurement processes, contracts.	Managing supplier relationships, processing payments, service delivery.	Contract performance, Legitimate interest.

Data Category	Source of Collection	Purpose of Processing	Legal Basis
Website Visitor Data (IP address, browser type, cookies, pages visited).	Automated technologies (cookies, logs).	Website functionality, analytics, security improvement.	Legitimate interest, Consent (for non-essential cookies).

5. Data Sharing & Transfers

5.1 Third-Party Disclosures

We may share Personal Data with trusted third parties only where necessary and under strict contractual safeguards, including:

- a) **Service Providers:** Cloud storage (e.g., Microsoft 365, AWS), payment processors, IT support.
- b) **Professional Advisers:** Lawyers, auditors, accountants.
- c) **Regulatory Authorities:** As required by Ugandan law (e.g., URA, UCC).
- d) **Business Transfers:** In connection with a merger, acquisition, or sale of assets.

5.2 Cross-Border Transfers

Where data must be transferred outside Uganda, we ensure an adequate level of protection exists as required by the DPPA, typically through Standard Contractual Clauses or the recipient's certification under approved international frameworks.

6. Data Security

We implement appropriate technical and organizational measures to protect Personal Data, including:

- a) Encryption of data in transit and at rest.
- b) Access controls and authentication protocols.
- c) Regular security assessments and staff training.
- d) Secure physical access controls to our facilities and data centers.
- e) Incident response and breach notification procedures as mandated by law.

7. Data Retention

We retain Personal Data only for as long as necessary to fulfil the purposes outlined in this Policy, or as required by contract, law, or regulatory obligation (e.g., tax records). A detailed retention schedule is maintained internally. Data is securely disposed of thereafter.

8. Your Rights as a Data Subject

Under the DPPA, you have the right to:

- a) **Be informed** about the collection and use of your data.
- b) **Access** your Personal Data.
- c) **Rectify** inaccurate or incomplete data.
- d) **Erase** your data (the "right to be forgotten") in certain circumstances.
- e) **Restrict or object to** processing in specific situations.
- f) **Data portability**, where applicable.
- g) **Lodge a complaint** with the **Personal Data Protection Office (PDPO)** of Uganda.

To exercise these rights, please contact our DPO using the details in Section 11.

9. Cookies and Online Tracking

Our website uses necessary cookies for basic functionality. We may use optional analytics cookies only with your prior consent, which you can manage via our cookie banner or your browser settings.

10. Policy Updates

We may update this Policy periodically to reflect legal, operational, or technical changes. The latest version will always be posted on our website with a revised "Effective Date."

11. Contact and Complaints

For all data privacy inquiries, to exercise your rights, or to report a concern, please contact:

The Data Protection Officer

Japotech Solutions Uganda Limited

Plot 19, Bukoto Street, Kamwokya, Kampala

Email: info@japotech.com

Phone: +256771994556

If you are not satisfied with our response, you have the right to lodge a complaint with the Ugandan regulatory authority:

The Personal Data Protection Office (PDPO)

National Information Technology Authority - Uganda (NITA-U)

7th Floor, Padre Pio House, Plot 32 Lumumba Avenue, Kampala.

Email: info@pdpo.go.ug

Phone: +256 417 801 008/+256 790 807 491

Policy Approval:



Managing Director

9th January 2026