ELPIDA RISING FOUNDATION UGANDA

DATA PROTECTION AND PRIVACY POLICY

Motto: Empowering Vulnerable Communities Through Education, Inclusion, and Sustainable Livelihoods

Policy Owner: Elpida Rising Foundation Uganda

Policy Type: **Data Protection and Privacy Policy**

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1. INTRODUCTION

Elpida Rising Foundation Uganda is committed to protecting the privacy and personal data of the children, parents and guardians, persons with disabilities, staff, volunteers, donors, partners, schools and other individuals with whom the Foundation interacts.

The Foundation recognizes that personal data must be handled responsibly, securely, fairly and transparently.

This policy establishes the principles and procedures governing the collection, use, storage, disclosure, retention and disposal of personal data by Elpida Rising Foundation Uganda.

The policy is intended to support compliance with the applicable data protection and privacy laws and regulatory requirements of Uganda.

2. PURPOSE

The purposes of this policy are to:

1. Protect the privacy and personal data of individuals.

2. Explain how Elpida collects and processes personal data.

3. Ensure personal data is processed for legitimate and clearly defined purposes.

4. Ensure personal data is accurate, relevant and appropriately limited.

5. Establish appropriate data-retention and secure-disposal practices.

6. Protect personal data against unauthorized access, loss, disclosure, alteration or destruction.

7. Explain the rights of individuals whose personal data is processed by the Foundation.

8. Establish procedures for handling complaints, requests and personal-data breaches.

3. SCOPE

This policy applies to personal data processed by Elpida Rising Foundation Uganda in both electronic and physical form.

It applies to:

- Board members;

- Employees;

- Volunteers and interns;

- Consultants and contractors;

- Beneficiaries;

- Parents and guardians;

- Persons with disabilities;

- Donors and supporters;

- Partner schools and organizations;

- Service providers;

- Visitors and other individuals whose personal data is collected by the Foundation.

4. DEFINITIONS

Personal Data

Information relating to an identified or identifiable individual.

Data Subject

The individual to whom personal data relates.

Processing

Any operation performed on personal data, including collecting, recording, storing, using, sharing, updating or deleting it.

Data Controller

The person or organization that determines the purposes and means of processing personal data.

Data Processor

A person or organization that processes personal data on behalf of a data controller.

Personal Data Breach

A security incident resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

5. PERSONAL DATA WE MAY COLLECT

Depending on the Foundation's activities, Elpida may collect the following categories of personal data:

5.1 Beneficiary Information

- Names;

- Age/date of birth;

- Gender where necessary;

- Contact information;

- School information;

- Educational needs;

- Attendance and participation records;

- Beneficiary identification information where necessary;

- Photographs and audiovisual information where appropriately authorized.

5.2 Parent/Guardian Information

- Names;

- Telephone numbers;

- Addresses or location information where necessary;

- Relationship to the beneficiary;

- Relevant information required to support the beneficiary.

5.3 Disability and Vulnerability Information

Where necessary for program delivery, Elpida may collect information concerning disability, special educational needs or vulnerability.

Such information shall receive appropriate additional protection and shall only be collected and used for legitimate purposes.

5.4 Staff and Volunteer Information

- Names;

- Contact details;

- Identification information;

- Qualifications;

- Employment/volunteer records;

- Emergency contact information;

- Payment and administrative information where necessary.

5.5 Donor and Partner Information

- Names;

- Contact details;

- Organization details;

- Transaction or contribution information where necessary;

- Communication records.

6. PURPOSES OF PROCESSING PERSONAL DATA

Elpida shall collect and process personal data only for legitimate and specified purposes, including:

- Identifying and enrolling beneficiaries;
- Providing educational support;
- Providing bursary and school-related assistance;
- Monitoring beneficiary attendance and participation;
- Supporting inclusive education;
- Communicating with parents and guardians;
- Coordinating with partner schools;
- Planning and delivering programs;
- Monitoring and evaluating programs;
- Reporting to authorized donors, partners and regulators;
- Managing staff and volunteers;
- Financial and administrative management;
- Safeguarding beneficiaries;
- Responding to complaints and enquiries;
- Meeting applicable legal and regulatory obligations.

7. DATA PROTECTION PRINCIPLES

Elpida shall process personal data according to the following principles:

7.1 Lawfulness, Fairness and Transparency

Personal data shall be processed lawfully, fairly and transparently.

7.2 Purpose Limitation

Personal data shall be collected for specified, explicit and legitimate purposes and shall not be used for incompatible purposes.

7.3 Data Minimization

Only personal data reasonably necessary for the intended purpose shall be collected.

7.4 Accuracy

Reasonable measures shall be taken to keep personal data accurate and up to date.

7.5 Storage Limitation

Personal data shall not be retained longer than reasonably necessary for the purpose for which it was collected or as required by law.

7.6 Security

Appropriate technical and organizational measures shall be implemented to protect personal data.

7.7 Accountability

Elpida shall maintain appropriate records and procedures demonstrating responsible data-protection practices.

8. COLLECTION OF PERSONAL DATA

Personal data shall, where reasonably practicable, be collected directly from the individual or their authorized parent/guardian.

When collecting personal data, Elpida shall provide appropriate information regarding:

- Who is collecting the information;

- What information is being collected;

- Why the information is required;

- How the information will be used;

- Who it may be shared with;

- How long it may be retained;

- Applicable rights and complaint mechanisms.

For children, Elpida shall apply appropriate safeguards and obtain consent or authorization from a parent, guardian or other legally authorized person where required.

9. CONSENT

Where consent is relied upon as the appropriate legal basis for processing, Elpida shall seek consent in a manner that is understandable and appropriate to the circumstances.

Consent shall not be assumed merely because an individual provides information.

Where appropriate, individuals shall be informed of how they may withdraw consent.

The withdrawal of consent shall not affect processing already lawfully carried out before withdrawal.

10. CHILDREN'S PERSONAL DATA

Elpida works with vulnerable children and therefore recognizes the need for enhanced protection of children's personal data.

The Foundation shall:

- Collect only information reasonably necessary for program purposes;

- Apply appropriate parental/guardian or legally authorized consent mechanisms where required;

- Restrict access to children's records;

- Avoid unnecessary disclosure of children's information;

- Take appropriate care when photographing or recording children;

- Avoid publicly identifying vulnerable children unnecessarily;

- Apply appropriate safeguards when publishing photographs, stories or case studies;

- Consider the best interests and safety of the child when processing their information.

11. PHOTOGRAPHS, VIDEOS AND STORIES

Photographs, videos, testimonials and beneficiary stories may constitute personal data.

Before using such material for publicity, fundraising, reporting, social media, websites or other public communications, Elpida shall consider:

- Whether appropriate consent or other lawful basis exists;

- Whether publication is necessary;

- Whether the individual can be identified;

- Whether publication could cause harm, stigma or embarrassment;

- Whether identifying information can be minimized;

- Whether additional safeguards are necessary for children and vulnerable persons.

Where appropriate, identifying details shall be removed or limited.

12. SHARING AND DISCLOSURE OF PERSONAL DATA

Elpida shall not disclose personal data unnecessarily.

Personal data may be shared where necessary for legitimate Foundation activities, including with:

- Partner schools;

- Parents or guardians;

- Donors or funding partners where appropriately authorized;

- Professional advisers or service providers;

- Government or regulatory authorities where legally required;

- Data processors providing services to the Foundation.

Information shared shall be limited to what is reasonably necessary for the relevant purpose.

13. THIRD-PARTY SERVICE PROVIDERS

Where third parties process personal data on behalf of Elpida, the Foundation shall take reasonable steps to ensure that appropriate data-protection and confidentiality safeguards are in place.

This may include providers of:

- Email and cloud storage services;

- Website and hosting services;

- Accounting services;

- IT services;

- Monitoring and evaluation services;

- Communication platforms;

- Other services involving personal data.

Where appropriate, agreements with such providers shall include confidentiality, security and data-protection obligations.

14. INTERNATIONAL DATA TRANSFERS

Elpida may use cloud-based or other services whose infrastructure or processing activities may involve locations outside Uganda.

Where personal data is transferred or processed outside Uganda, Elpida shall take reasonable steps to ensure that the transfer or processing is carried out in accordance with applicable data-protection requirements and that appropriate safeguards are considered.

15. DATA RETENTION

Elpida shall retain personal data only for as long as reasonably necessary for the purpose for which it was collected, legitimate organizational requirements, accountability, or applicable legal and regulatory obligations.

Indicative retention periods shall be determined according to the category of information.

For example:

Category| Indicative Retention Beneficiary program records| Duration of program + appropriate accountability period

Parent/guardian records| Duration of beneficiary support + appropriate accountability period

Staff records| Duration of employment/engagement + applicable legal requirements

Volunteer records| Duration of engagement + appropriate accountability period

Financial records| In accordance with applicable legal/accounting requirements

Consent records| For as long as necessary to demonstrate the relevant consent or legal basis

Complaints and incident records| For as long as necessary for resolution, accountability and legal requirements

Retention periods may be reviewed based on legal, contractual, donor or program requirements.

16. SECURITY OF PERSONAL DATA

Elpida shall implement reasonable technical and organizational measures to protect personal data, including:

- Password protection;

- Access controls;

- Need-to-know access;

- Two-factor authentication where available;

- Encryption where available and appropriate;

- Secure email and cloud-storage practices;

- Antivirus and malware protection;

- Software and security updates;

- Physical protection of paper records;

- Secure backups;

- Staff confidentiality obligations;

- Staff data-protection awareness and training;

- Secure disposal of personal data.

17. DATA ACCURACY

Elpida shall take reasonable steps to ensure that personal data is accurate and up to date.

Individuals may be asked to verify or update their information where necessary.

Where inaccurate personal data is identified, reasonable steps shall be taken to correct it.

18. RIGHTS OF DATA SUBJECTS

Subject to applicable law and relevant conditions, individuals may have rights concerning their personal data, including the right to:

- Know that their personal data is being collected or processed;

- Access information about their personal data;

- Request correction of inaccurate or incomplete information;

- Request deletion where applicable;

- Object to certain processing;

- Withdraw consent where consent is the applicable basis;

- Raise concerns or lodge complaints regarding the processing of their personal data.

Requests should be directed to the person designated by Elpida to handle data-protection matters.

19. DATA PROTECTION REQUESTS

Elpida shall establish a process for receiving and responding to requests relating to personal data.

Requests shall be:

1. Received and recorded;

2. Verified where reasonably necessary;

3. Assessed;

4. Referred to the appropriate responsible person;

5. Responded to within applicable legal or organizational requirements;

6. Documented for accountability.

Where a request cannot be fulfilled, the Foundation shall provide an appropriate explanation where required.

20. COMPLAINTS AND GRIEVANCES

Individuals may raise concerns about the handling of their personal data.

Elpida shall maintain an appropriate grievance mechanism for receiving, investigating and resolving privacy complaints.

Complaints shall be handled fairly, confidentially and without unnecessary delay.

Where a complaint cannot be resolved internally, the complainant may be informed of any applicable external complaint or regulatory mechanisms.

21. PERSONAL DATA BREACHES

A personal data breach may include:

- Loss or theft of personal records;

- Unauthorized access;

- Accidental disclosure;

- Sending information to the wrong recipient;

- Hacking or account compromise;

- Malware or ransom ware;

- Unauthorized alteration or deletion;

- Loss of a device containing personal data.

All suspected breaches shall be reported immediately to the person responsible for data protection within Elpida.

The Foundation shall take reasonable steps to:

1. Identify and assess the breach;

2. Contain the breach;

3. Secure affected information;

4. Assess potential harm;

5. Document the incident;

6. Take corrective and preventive action;

7. Make notifications to the relevant authority and/or affected individuals where required by applicable law.

22. STAFF AND VOLUNTEER RESPONSIBILITIES

Staff, volunteers, interns, consultants and other authorized persons shall:

- Keep personal data confidential;

- Access information only when authorized;

- Use personal data only for legitimate purposes;

- Protect passwords and devices;

- Avoid unnecessary disclosure;

- Follow Foundation data-protection procedures;

- Report suspected breaches promptly;

- Participate in relevant training.

Unauthorized use or disclosure of personal data may result in appropriate corrective or disciplinary action.23. DATA PROTECTION BY DESIGN AND DEFAULT

When introducing new programs, technologies, databases, forms or systems involving personal data, Elpida shall consider privacy and data-protection requirements from the beginning.

Where appropriate, the Foundation shall consider:

- What personal data is necessary;

- Whether less data can achieve the same purpose;

- Who needs access;

- How the information will be secured;

- How long it will be retained;

- Whether third parties will process it;

- Whether a data protection impact assessment is necessary.

24. DATA PROTECTION IMPACT ASSESSMENTS

Where processing is likely to create significant risks to individuals' privacy or rights, Elpida shall consider whether a Data Protection Impact Assessment (DPIA) or similar risk assessment should be conducted.

Particular care shall be given to activities involving:

- Children;

- Vulnerable persons;

- Persons with disabilities;

- Large-scale personal-data processing;

- Sensitive or high-risk personal information;

- New technologies or systems;

- Extensive sharing of personal data.

25. RECORDS AND ACCOUNTABILITY

Elpida shall maintain appropriate records to demonstrate responsible personal-data management.

Records may include:

- Data-processing activities;

- Consent records where applicable;

- Data-sharing arrangements;

- Data-retention schedules;

- Data-protection incidents;

- Complaints;

- Staff training;

- Third-party service providers;

- DPIAs or privacy risk assessments where conducted.

26. POLICY GOVERNANCE

The Foundation shall designate an appropriate person or responsible office to coordinate data-protection and privacy matters.

The responsible person shall, as appropriate:

- Promote compliance with this policy;

- Coordinate data-protection training;

- Receive privacy complaints and requests;

- Coordinate incident response;

- Maintain relevant documentation;

- Support data-protection risk assessments;

- Advise management on privacy matters.

27. POLICY REVIEW

This policy shall be reviewed:

- At least annually;

- When there are significant changes to the Foundation's activities;

- When there are significant changes to applicable laws or regulations;

- Following a significant data-protection incident;

- When new technologies or processing activities are introduced.

28. NON-COMPLIANCE

Failure to comply with this policy may expose Elpida Rising Foundation Uganda and individuals to legal, financial, operational and reputational risks.

Where appropriate, violations may result in corrective or disciplinary action in accordance with applicable organizational procedures and contractual arrangements.

29. APPROVAL; This Data Protection and Privacy Policy was reviewed and approved by the authorised governing body/management of Elpida Rising Foundation Uganda.

Approved by: .....
Name: WINNIE BEIGARAHO
Position: BOARD CHAIRPERSON
Date: .05th March 2026

END OF POLICY