AIRTEL UGANDA LIMITED

Airtel Towers, Plot 16A, Clement Hill Road, Nakasero, Kampala
Uganda

# PRIVACY NOTICE

## What is this Privacy Notice for?

Airtel Uganda Limited values your Personal Data and we are committed to protecting your privacy whenever you interact with us.

By this Notice, we explain to you how your Personal Data is collected, used, managed and transferred by Airtel and explains how you can update your Personal Data with us and exercise your rights in respect of the Personal Data provided to us.

## General Definitions

**"Data controllers"** are the people who, or organizations which, determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with Personal Data Protection and Privacy laws. Airtel is the data controller of all personal data used across the business relating solely to the Headquarter. Each member of the Airtel Africa Group is the data controller of all personal data across the business within its jurisdiction.

"**Data processors"** include any person who processes personal data on behalf of a data controller. Employees of data controllers are excluded from this definition, but it could include suppliers and or vendors that handle personal data on our behalf.

"**Data subjects"** for the purpose of this policy include all living individuals about whom personal data has been requested, collected, collated, processed, or stored. A data subject need not be a national of or resident in the countries in which we operate. All data subjects have legal rights in relation to their personal data.

"**Data users"** include employees whose work involves using or otherwise processing personal data. Data users have a duty to protect the information they handle by following our data protection and security policies (including this policy) at all times.

"**Processing"** is any activity that involves use or retention of the data. It includes obtaining, recording, or holding the data, or carrying out any operation or set of operations on the data including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

"**Sensitive personal data"** includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, genetic or biometric identifiers, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings.

## What is "Personal Data"?

Personal data means information relating to a living individual from which that living individual can be identified, either from that information alone or from other information that is in, or is reasonably likely to come into, the Airtel's possession. Examples of personal data include

names, dates of birth, location, identity card numbers, HR files about employees, the details of consumers and individual contacts of suppliers and customers (such as their account details, email addresses and phone numbers), contact details held in the Outlook address book, and data collected relating to the time, place and manner of use by individuals of Airtel's websites (including IP addresses, location and cookies).

**Legal basis for processing**

Airtel will process personal data based on one of the following grounds:

a) **performing a contract or to enter into a contract with the data subject**, for example, we process the numbers customers dial, how much data they use and when they do it so we can provide them with a connection and issue a bill;

b) **Airtel's legitimate business interests**, as long as these do not override the data subject's rights and freedoms. For example, fraud prevention, security of our network and services, marketing, analysing and improving our services;

c) **complying with a mandatory legal obligation**, for example KYC, accounting, tax, money laundering, anti-bribery requirements; or

d) **data subjects' consent**. Consent may be withdrawn at any time.

**Personal Data Collected**

We collect Personal Data that you give to us, for example, when you buy a sim, register the details, request for further information about our product, fill a form, apply for a job through our website, provide us with your data on any of our data collection point and when you subscribe to newsletters on our website. The information that we may collect includes phone number, location address, Certificate of Incorporation, Certificate of Registration, National Identification Number, Tax Identification Number, age, date of birth, occupation, residential/ physical address, signature, refugee number, passport number, email addresses, debit/credit card number,

We may also automatically collect some technical information when you visit our website such as your IP address, and information about your visit, such as the pages that you viewed. This information helps us understand customer interests and helps us improve our website. When you visit our site, the pages that you look at, and a short text file called a cookie, are downloaded to your computer. By visiting and using our website, you agree to our use of cookies in line with Airtel policies.

**Use of Personal Data**

We may process your Personal Data to communicate with you (including sending marketing or promotional materials to you), provide you with further information about our products and how we can serve you better, respond to your purchase orders or requests, and process your application for employment with Airtel Networks or to fulfil our contractual obligations with you. We may also process your Personal Data to comply with provisions of applicable laws.

**How do we Process Personal data?**

We process all personal data in accordance with the data protection principles below. All Airtel employees follow these principles if they process personal data:

Processing must be fair, lawful and transparent**.** The data subject is told who the data controller is, who the data controller's representative is, the purpose for which the personal data is to be processed and the identities of anyone to whom the personal data may be disclosed or transferred. Where Airtel collects personal data directly, this information is provided on or before collection of the personal data.

Processing must be for limited purpose and must be done in an appropriate way. Personal data is only processed for the specific purposes notified to the data subject when the data was first collected or for any other purposes specifically permitted by Data Protection and Privacy Laws. This means that personal data will not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject is informed of the new purpose before any processing occurs, and their consent may be required.

The processing must be adequate, relevant and limited to what is necessary for the purposes. Personal data is only be collected to the extent that it is required for the specific purpose notified to the data subject. Any data that is not necessary for that purpose should is not collected in the first place.

Personal data must be accurate and kept up to date. Information that is incorrect or misleading is not accurate, and steps should be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data must be corrected, destroyed or erased from the Airtel's systems, as appropriate.

Personal data must not be kept longer than necessary for the purpose. This means that personal data is destroyed or erased from our systems when it is no longer required for the specified purpose that it was collected for, provided that Airtel may retain personal data in order to comply with applicable laws, regulations and rules.

Personal data must be kept secure. Appropriate security measures are employed against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. Data Protection and Privacy Laws require us to put in place procedures, technologies, and other measures to maintain the security of all personal data from the point of collection to the point of destruction. Personal data is transferred to a third-party data processor under a written agreement containing the required Data Privacy Law terms and if that processor can provide Airtel with sufficient guarantees, in particular in terms of expert knowledge, reliability and resources, that it can comply with the requirements of Data Protection and Privacy Laws.

Where consent is required by the data subject, the consent must be freely given, specific, informed and an unambiguous indication of the data subject's wish whereby he or she, by a statement or by a clear affirmative action, signifies agreement to the collection or processing of personal data relating to him or her.

When the Airtel develops new systems and new ways of processing personal data, it considers the data privacy principles above. Where those systems or processing could be likely to pose a high risk to the privacy of data subjects (e.g. systematic profiling of a large number of data subjects on an automated basis in a way that affects their legal rights or status), the relevant Airtel will carry out a Data Protection Impact Assessment in relation to that processing.

**What Constitutes your Consent?**

Where processing of Personal Data is based on consent, we shall obtain the requisite consent at the time of collection of the Personal Data. In this regard, you consent to the processing of your Personal Data when you access our platforms, or use our services, content, features, technologies or functions offered on our website or other digital platforms. You can withdraw your consent at any time but such withdrawal will not affect the lawfulness of processing based on consent given before its withdrawal.

**Sharing of Personal Data**

We respect your privacy and we limit disclosure of your Personal Data to third parties. We do not sell, give or trade any Personal Data that we obtain from you to any third party for data mining or marketing purposes. However, we may share your Personal Data with service providers engaged by us to provide services to Airtel subject to appropriate data security and protection. We may also share your information where there is a regulatory or statutory obligation to disclose such Personal Data in accordance with provisions of applicable laws.

**Security and Retention of your Personal Data**

Your Personal Data is kept private and we make every effort to keep your Personal Data secure, including restricting access to your Personal Data with us on a need to know basis. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate security standards to protect your Personal Data.

We take appropriate measures to ensure that your Personal Data is only processed for the minimum period necessary in line with the purposes set out in this Notice or as required by applicable laws, until a time it is no longer required or has no use. Once your Personal Data is no longer required, we destroy it in a safe and secure manner.

**Rights of Data Subjects**

All data subjects have rights under data privacy laws regarding the processing of their personal data, including rights to, in certain circumstances:

a) request access to any personal data held about them by the Airtel and be provided information in relation to that data (including the purposes for which the data is processed, the recipients to whom that personal data have been or will be disclosed, how long it will be stored for, details of any automated decision-making and their right to lodge a complaint with a supervisory authority);

b) have inaccurate personal data amended or erased, and to have incomplete personal data completed;

c) request the erasure of their personal data (the so-called 'right to be forgotten');

d) object to or restrict the processing of their personal data (including where their personal data is processed for direct marketing purposes);

e) object to any decision that affects them being taken solely by a computer or other automated process (including profiling).

**Cross Border Transfer of Personal Data**

As a multinational, your personal data may be transferred to or accessed by other affiliated companies. This transfer will be conducted in compliance with laws on cross border transfers ensuring adequate safeguards for the protection of the personal data.

**Cookies**

We may store some of your data using "cookies" i.e. a small text file that can be stored on and accessed from your device when you visit one of our websites. This enables us to recognize you when you visit our websites. The use of cookies allows us to identify you, track your preferences and the use of our websites.

**Changes to our Privacy Notice**

Due to constant changes in technology and regulatory requirements, we may need to change our privacy policies or update this Notice from time to time. You will always be able to find the most recent version of our updated privacy policy on this site.

**Contents**

All contents published on our website reflect the latest available information. There is possibility that some of the content may be outdated, and this is not due to negligence. Only formal documents are official and reflect all company changes. The company is not to be held liable in respect to the content on this site if used in sole discretion. We have full rights to change content without prior notice.

**Queries**

If you would like further information on this notice, or to contact our Data Protection Officer at aul.privacy@ug.airtel.com or click https://airtel.co.ug/contact-us for any other queries.