

1. Introduction

1.1 Background to the General Data Protection Regulation ('GDPR')

The General Data Protection Regulation 2016 replaces the EU Data Protection Directive of 1995 and supersedes the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. Its purpose is to protect the "rights and freedoms" of natural persons (i.e. living individuals) and to ensure that Personal Data is not processed without their knowledge, and, wherever possible, that it is processed with their consent.

1.2 Material scope – the GDPR applies to the Processing of Personal Data wholly or partly by automated means (i.e. by computer) and to the Processing other than by automated means of Personal Data (i.e. paper records) that form part of a Filing System or are intended to form part of a Filing System.

Territorial scope – This Data Protection Policy applies to all companies of the DPO Group that are established in the EU (European Union) who retain and process the Personal Data of Data Subjects. It will also apply to all companies of the DPO Group outside of the EU that process Personal Data in order to offer goods and services, or monitor the behavior of Data Subjects who are resident in the EU. The DPO Group's companies are not entitled to adopt different internal regulations that deviate from this Data Protection Policy. Additional data protection policies can be created in agreement with the Data Protection Officer only if required by applicable national laws.

Article 4 definitions

Child – the GDPR defines a Child as anyone under the age of 16 years old, although this may be lowered to 13 by Member State law. The Processing of Personal Data of a Child is only lawful if parental or custodian consent has been obtained. The controller shall make reasonable efforts to verify in such cases that consent is given or authorised by the holder of parental responsibility over the Child.

Data Controller – the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data; where the purposes and means of such Processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Data Processor – any operation performed by DPO on personal data (sets), such as creation, collection, storage, view, transport, use, modification, transfer, deletion, etc., whether or not by automated means.

Data Subject – any living natural person who is the subject of Personal Data held by an organisation.

Data Subject Consent - means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data.

DATA PROTECTION POLICY for DIRECT PAY (U) LTD.

Document Control
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Protection Policy
Issue No: V1.3a
Issue Date: Sept 2021
Page: 2 of 13

Establishment – means the main Establishment of the controller and/or processor as the case may be. The main Establishment of the controller in the EU will be the place in which the controller makes the main decisions as to the purpose and means of its data Processing activities. The main Establishment of a processor in the EU will be its administrative center. If a controller is based outside the EU, it will have to appoint a representative in the jurisdiction in which the controller operates to act on behalf of the controller and deal with supervisory authorities.

Filing System – any structured set of Personal Data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

Personal Data – any information relating to an identified or identifiable Data Subject; an identifiable Data Subject is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Data Breach – a breach of security leading to the accidental, or unlawful, destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed. There is an obligation on the controller to report Personal Data breaches to the supervisory authority and where the breach is likely to adversely affect the Personal Data or privacy of the Data Subject.

Processing – any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling – is any form of automated Processing of Personal Data intended to evaluate certain personal aspects relating to a natural person, or to analyse or predict that person's performance at work, economic situation, location, health, personal preferences, reliability, or behavior. This definition is linked to the right of the Data Subject to object to Profiling and a right to be informed about the existence of Profiling, of measures based on Profiling and the envisaged effects of Profiling on the individual.

Special Categories of Personal Data – Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Third Party – a natural or legal person, public authority, agency or body other than the Data Subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process Personal Data.

2. Policy statement

- 2.1 The Board of Directors and management DPO, located at 3G Direct Pay Limited, Suite #3, Ulysses House, Foley Street #1, Dublin 1, Ireland, Tel +353 1 8881005, are committed to compliance with all relevant EU and Member State laws in respect of Personal Data, and the protection of the “rights and freedoms” of individuals whose information DPO collects and processes in accordance with the General Data Protection Regulation (GDPR).
- 2.2 Compliance with the GDPR is described by this policy and other relevant policies such as the Information Security Policy with connected processes and procedures.
- 2.3 The GDPR and this policy apply to all of DPO’s Personal Data Processing functions, including those performed on customers’, clients’, employees’, suppliers’ and partners’ Personal Data, and any other Personal Data the organisation processes from any source.
- 2.4 DPO has established objectives for data protection and privacy, which are in GDPR Objectives Record.
- 2.5 Data Protection Officer is responsible for reviewing the register of Processing annually in the light of any changes to DPO’s activities (as determined by changes to the data inventory register and the management review) and to any additional requirements identified by means of data protection impact assessments. This register needs to be available on the supervisory authority’s request.
- 2.6 This policy applies to all Employees/Staff and service providers of DPO such as outsourced suppliers. Any breach of the GDPR will be dealt with under DPO’s disciplinary policy and may also be a criminal offence, in which case the matter will be reported as soon as is reasonably possible to the appropriate authorities.
- 2.7 Partners and any third parties working with or for DPO, and who have or may have access to Personal Data, will be expected to have read, understood and to comply with this policy. No Third Party may access Personal Data held by DPO without having first entered into a data confidentiality agreement (Third Party Personal Data Protection, Security Declaration and Confidentiality Agreement), which imposes on the Third Party obligations no less onerous than those to which DPO is committed, and which gives DPO the right to audit compliance with the agreement.

3. Responsibilities and roles under the General Data Protection Regulation

- 3.1 DPO is a Data Controller and Data Processor under the GDPR.
- 3.2 Senior management and all those in managerial or supervisory roles throughout DPO are responsible for developing and encouraging good information handling practices within DPO; responsibilities are set out in individual job descriptions.

The Data Protection Officer (DPO GDPR Data Protection Officer appointments and Job Description. V1.0), a role specified in the GDPR, should be a member of the senior management team, is accountable to Board of Directors of DPO for the management of Personal Data within DPO and for ensuring that compliance with data protection legislation and good practice can be demonstrated. This accountability includes:

- 3.2.1 development and implementation of the GDPR as required by this policy; and
- 3.2.2 security and risk management in relation to compliance with the policy.

- 3.3 The Data Protection Officer, whose Board of Directors considers him/her to be suitably qualified and experienced, has been appointed to take responsibility for DPO's compliance with this policy on a day-to-day basis and, in particular, has direct responsibility for ensuring that DPO complies with the GDPR, as do Manager/Executive (generic/line)'s in respect of data Processing that takes place within their area of responsibility.
- 3.4 The Data Protection Officer have specific responsibilities in respect of procedures such as the DPO GDPR Subject Access Request Procedure and are the first point of call for Employees/Staff seeking clarification on any aspect of data protection compliance.
- 3.5 Compliance with data protection legislation is the responsibility of all Employees/Staff of DPO who process Personal Data.
- 3.6 DPO's Training Policy sets out specific training and awareness requirements in relation to specific roles and Employees/Staff of DPO generally.
- 3.7 Employees/Staff of DPO are responsible for ensuring that any Personal Data about them and supplied by them to DPO is accurate and up-to-date.

4. Data protection principles

All Processing of Personal Data must be conducted in accordance with the data protection principles as set out in Article 5 of the GDPR. DPO's policies and procedures are designed to ensure compliance with the principles.

4.1 Personal Data must be processed lawfully, fairly and transparently.

Data is processed lawfully where a lawful basis is identified before Personal Data is processed. These are often referred to as the "conditions for Processing", for example consent.

Data is processed fairly if the Data Controller has made certain information available to the Data Subjects as practicable. This applies whether the Personal Data was obtained directly from the Data Subjects or from other sources. The GDPR has increased requirements about what information should be available to Data Subjects, which is covered in the 'Transparency' requirement.

Data is processed transparently if it complies with the GDPR rules on giving privacy information to Data Subjects in Articles 12, 13 and 14. These are detailed and specific, placing an emphasis on making privacy notices understandable and accessible. Information must be communicated to the Data Subject in an intelligible form using clear and plain language.

DPO's Privacy Notice Procedure is set out in the DPO GDPR Data Privacy Policy.

The specific information that must be provided to the Data Subject must, as a minimum, include:

- 4.1.1 the identity and the contact details of the controller and, if any, of the controller's representative;
- 4.1.2 the contact details of the Data Protection Officer;
- 4.1.3 the purposes of the Processing for which the Personal Data are intended as well as the legal basis for the Processing;
- 4.1.4 the period for which the Personal Data will be stored;

- 4.1.5 the existence of the rights to request access, rectification, erasure or to object to the Processing, and the conditions (or lack of) relating to exercising these rights, such as whether the lawfulness of previous Processing will be affected;
- 4.1.6 the categories of Personal Data concerned;
- 4.1.7 the recipients or categories of recipients of the Personal Data, where applicable;
- 4.1.8 where applicable, that the controller intends to transfer Personal Data to a recipient in a third country and the level of protection afforded to the data;
- 4.1.9 any further information necessary to guarantee fair Processing.

4.2 Personal Data can only be collected for specific, explicit and legitimate purposes Data obtained for specified purposes must not be used for a purpose that differs from those formally notified to the supervisory authority as part of DPO's GDPR register of Processing. The DPO GDPR Data Privacy Policy sets out the relevant procedures.

4.3 Personal Data must be adequate, relevant and limited to what is necessary for Processing

- 4.3.1 The Data Protection Officer/GDPR Owner is responsible for ensuring that DPO does not collect information that is not strictly necessary for the purpose for which it is obtained.
- 4.3.2 All data collection forms (electronic or paper-based), including data collection requirements in new information systems, must include a fair Processing statement or link to privacy statement and approved by the Data Protection Officer.
- 4.3.3 The Data Protection Officer will ensure that, at least annually all data collection methods are reviewed by the DPO GDPR Team, to ensure that collected data continues to be adequate, relevant and not excessive (DPO GDPR Data Protection Impact Assessment Procedure and DPO GDPR DPIA Tool).

4.4 Personal Data must be accurate and kept up to date with every effort to erase or rectify without delay

- 4.4.1 Data that is stored by the Data Controller must be reviewed and updated as necessary. No data should be kept unless it is reasonable to assume that it is accurate.
- 4.4.2 The Data Protection Officer is responsible for ensuring that all staff are trained in the importance of collecting accurate data and maintaining it.
- 4.4.3 It is also the responsibility of the Data Subject to ensure that data held by DPO is accurate and up to date. Completion of a registration or application form by a Data Subject will include a statement that the data contained therein is accurate at the date of submission.
- 4.4.4 Employees/Staff AND Third Party service providers should be required to notify DPO of any changes in circumstance to enable personal records to be updated accordingly. Instructions for updating records are contained in the DPO GDPR Training Policy. It is the responsibility of DPO to ensure that any notification regarding change of circumstances is recorded and acted upon.
- 4.4.5 The Data Protection Officer is responsible for ensuring that appropriate procedures and policies are in place to keep Personal Data accurate and up

to date, taking into account the volume of data collected, the speed with which it might change and any other relevant factors.

- 4.4.6 On at least an annual basis, the Data Protection Officer will review the retention dates of all the Personal Data processed by DPO, by reference to the data inventory, and will identify any data that is no longer required in the context of the registered purpose. This data will be securely deleted/destroyed in line with the DPO GDPR Secure Disposal of Storage Media Procedure.
- 4.4.7 The Data Protection Officer is responsible for responding to requests for rectification from Data Subjects within one month (DPO GDPR Subject Access Request Procedure). This can be extended to a further two months for complex requests. If DPO decides not to comply with the request, the Data Protection Officer must respond to the Data Subject to explain its reasoning and inform them of their right to complain to the supervisory authority and seek judicial remedy.
- 4.4.8 The Data Protection Officer is responsible for making appropriate arrangements that, where third-party organisations may have been passed inaccurate or out-of-date Personal Data, to inform them that the information is inaccurate and/or out of date and is not to be used to inform decisions about the individuals concerned; and for passing any correction to the Personal Data to the Third Party where this is required.

4.5 Personal Data must be kept in a form such that the Data Subject can be identified only as long as is necessary for Processing.

- 4.5.1 Personal Data will be retained in line with the DPO GDPR Retention of Records Procedure and, once its retention date is passed, it must be securely destroyed as set out in this procedure.
- 4.5.2 The Data Protection Officer must specifically approve any data retention that exceeds the retention periods defined in DPO GDPR Retention of Records Procedure and must ensure that the justification is clearly identified and in line with the requirements of the data protection legislation. This approval must be in writing.

4.6 Personal Data must be processed in a manner that ensures the appropriate security.

The Data Protection Officer will carry out a risk assessment, taking into account all the circumstances of DPO's controlling or Processing operations.

In determining appropriateness, the Data Protection Officer should also consider the extent of possible damage or loss that might be caused to individuals (e.g. staff or customers) if a security breach occurs, the effect of any security breach on DPO itself, and any likely reputational damage including the possible loss of customer trust.

When assessing appropriate technical measures, the Data Protection Officer will consider the following:

- Password protection;
- Automatic locking of idle terminals;
- Removal of access rights for USB and other memory media;
- Virus checking software and firewalls;
- Role-based access rights including those assigned to temporary staff;

- Encryption of devices that leave the organisations premises such as laptops;
- Security of local and wide area networks;
- Privacy enhancing technologies such as pseudonymisation and anonymisation;
- Identifying appropriate international security standards relevant to DPO.

When assessing appropriate organisational measures the Data Protection Officer will consider the following:

- The appropriate training levels throughout DPO;
- Measures that consider the reliability of employees (such as references etc.);
- The inclusion of data protection in employment contracts;
- Identification of disciplinary action measures for data breaches;
- Monitoring of staff for compliance with relevant security standards;
- Physical access controls to electronic and paper based records;
- Adoption of a clear desk policy;
- Storing of paper based data in lockable fire-proof cabinets;
- Restricting the use of portable electronic devices outside of the workplace;
- Restricting the use of employee's own personal devices being used in the workplace;
- Adopting clear rules about passwords;
- Making regular backups of Personal Data and storing the media off-site;
- The imposition of contractual obligations on the importing organisations to take appropriate security measures when transferring data outside the EEA.

These controls have been selected on the basis of identified risks to Personal Data, and the potential for damage or distress to individuals whose data is being processed.

4.7 The controller must be able to demonstrate compliance with the GDPR's other principles of accountability:

The GDPR includes provisions that promote accountability and governance. These complement the GDPR's transparency requirements. The controller is accountable for the maintenance of compliance with the principles defined in Article 5(1) of the GDPR

Then three principles can be summarised as follows:

4.7.1 Responsibility.

The appropriate technical and organisational measures have been implemented and are maintained proactively, systematically, and on an ongoing basis.

4.7.2 Ownership.

The technical and organisational measures are embedded at each level in the organisation, within each department or function that processes the personal data.

4.7.3 Evidence.

The relevant documentation can be produced and used as evidence to demonstrate compliance at any time. Compliance should be demonstrated to the data protection authority, and to interested parties (clients, employees, etc.).

DPO will demonstrate compliance with the data protection principles by implementing data protection policies, adhering to codes of conduct, implementing technical and organisational measures, as well as adopting techniques such as data protection by design, DPIAs, breach notification procedures and incident response plans.

5. Data Subjects' rights

5.1 Data Subjects have the following rights regarding data Processing, and the data that is recorded about them:

- 5.1.1 To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- 5.1.2 To prevent Processing likely to cause damage or distress.
- 5.1.3 To prevent Processing for purposes of direct marketing.
- 5.1.4 To be informed about the mechanics of automated decision-taking process that will significantly affect them.
- 5.1.5 To not have significant decisions that will affect them taken solely by automated process.
- 5.1.6 To sue for compensation if they suffer damage by any contravention of the GDPR.
- 5.1.7 To take action to rectify, block, erased, including the right to be forgotten, or destroy inaccurate data.
- 5.1.8 To request the supervisory authority to assess whether any provision of the GDPR has been contravened.
- 5.1.9 To have Personal Data provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
- 5.1.10 To object to any automated Profiling that is occurring without consent.

5.2 DPO ensures that Data Subjects may exercise these rights:

- 5.2.1 Data Subjects may make data access requests as described in DPO GDPR Subject Access Request Procedure; this procedure also describes how DPO will ensure that its response to the data access request complies with the requirements of the GDPR.
- 5.2.2 Data Subjects have the right to complain to DPO's Data Protection Officer related to the Processing of their Personal Data, the handling of a request from a Data Subject and appeals from a Data Subject on how complaints have been handled in line with the DPO GDPR Complaints Procedure.

6. Consent

6.1 DPO understands 'consent' to mean permission that has been explicitly and freely given, and a specific, informed and unambiguous indication of the Data Subject's wishes that, by statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her. The Data Subject can withdraw their consent at any time.

6.2 DPO further understands 'consent' to mean that the Data Subject has been fully informed of the intended Processing and has signified their agreement, while in a fit state of mind to do so and without pressure being exerted upon them. Consent

obtained under duress or on the basis of misleading information will not be a valid basis for Processing.

- 6.3 Granular options for consent must be done separately for different types of Processing as required.
- 6.4 There must be some active communication between the parties to demonstrate active consent. Consent cannot be inferred from non-response to a communication. The Controller must be able to demonstrate that consent was obtained for the Processing operation.
- 6.5 For sensitive data, explicit written consent DPO GDPR Consent Procedure for Data Subjects must be obtained unless an alternative legitimate basis for Processing exists.
- 6.6 In most instances, consent to process personal and sensitive data is obtained routinely by DPO using standard consent documents e.g. when a new client signs a contract, or during induction for participants on programmes.
- 6.7 Where DPO provides online services to Children, parental or custodial authorisation must be obtained. This requirement applies to Children under the age of 16 (unless the Member State has made provision for a lower age limit, which may be no lower than 13).

7. Security of data

- 7.1 All Employees/Staff are responsible for ensuring that any Personal Data that DPO holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any Third Party unless that Third Party has been specifically authorised by DPO to receive that information and has entered into the DPO Third Party Personal Data Protection, Security Declaration and Confidentiality Agreement.
- 7.2 All Personal Data should be accessible only to those who need to use it, and access may only be granted in line with the DPO GDPR Access Control Policy. All Personal Data should be treated with the highest security reasonable in the circumstances and must be kept:
 - in a lockable room with controlled access; and/or
 - in a locked drawer or filing cabinet; and/or
 - if computerised, password protected in line with corporate requirements in the DPO GDPR Access Control Policy; and/or
 - stored on (removable) computer media which are encrypted in line with Secure Disposal of Storage Media.
- 7.3 Care must be taken to ensure that PC screens and terminals are not visible except to authorised Employees/Staff of DPO. All Employees/Staff are required to enter into an Acceptable Use Agreement before they are given access to organisational information of any sort, which details rules on screen time-outs.
- 7.4 Manual records may not be left where they can be accessed by unauthorised personnel and may not be removed from business premises without explicit written / email authorisation. As soon as manual records are no longer required for day-to-day client support, they must be removed from secure archiving in line with the Manual document destruction in the DPO Retention Policy.
- 7.5 Personal Data may only be deleted or disposed of in line with the DPO GDPR Retention of Records Procedure. Manual records that have reached their retention date are to be shredded and disposed of as 'confidential waste'. Hard drives of

redundant PCs are to be removed and immediately destroyed as detailed by DPO GDPR Disposal Policy, before disposal.

7.6 Processing of Personal Data 'off-site' presents a potentially greater risk of loss, theft or damage to Personal Data. Staff must be specifically authorised to process data off-site.

8. Disclosure of data

8.1 DPO must ensure that Personal Data is not disclosed to unauthorised third parties which includes family members, friends, government bodies, and in certain circumstances, the Police. All Employees/Staff should exercise caution when asked to disclose Personal Data held on another individual to a Third Party. It is important to bear in mind whether or not disclosure of the information is relevant to, and necessary for, the conduct of DPO's business.

8.2 All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised by the Data Protection Officer.

9. Retention and disposal of data

9.1 DPO shall not keep Personal Data in a form that permits identification of Data Subjects for an unnecessarily extended period of time, in relation to the purpose(s) for which the data was originally collected.

9.2 DPO may store data for longer periods if the Personal Data will be processed solely for archiving purposes in the public interest, for scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the Data Subject.

9.3 The retention period for each category of Personal Data will be set out in the DPO GDPR Retention of Records Policy along with the criteria used to determine this period including any statutory obligations DPO has to retain the data.

9.4 DPO's data retention and data disposal procedures will apply in all cases.

9.5 Personal Data must be disposed of securely in accordance with the sixth principle of the GDPR – processed in an appropriate manner to maintain security, thereby protecting the "rights and freedoms" of Data Subjects. Any disposal of data will be done in accordance with the DPO GDPR Disposal Policy.

10. Data transfers

10.1 All exports of data from within the European Economic Area (EEA) to non-European Economic Area countries (referred to in the GDPR as 'Third Countries') are unlawful unless there is an appropriate "level of protection for the fundamental rights of the Data Subjects".

The transfer of Personal Data outside of the EEA is prohibited unless one or more of the following specified safeguards, or exceptions, apply:

10.1.1 An adequacy decision

The European Commission can and does assess Third Countries, a territory and/or specific sectors within Third Countries to assess whether there is an

appropriate level of protection for the rights and freedoms of natural persons. In these instances no authorisation is required.

Countries that are members of the European Economic Area (EEA) but not of the EU are accepted as having met the conditions for an adequacy decision.

10.1.2 Privacy Shield

If DPO wishes to transfer Personal Data from the EU to an organisation in the United States it should check that the organisation is signed up with the Privacy Shield framework at the U.S. Department of Commerce. The obligation applying to companies under the Privacy Shield are contained in the "Privacy Principles". The US DOC is responsible for managing and administering the Privacy Shield and ensuring that companies live up to their commitments. In order to be able to certify, companies must have a privacy policy in line with the Privacy Principles e.g. use, store and further transfer the Personal Data according to a strong set of data protection rules and safeguards. The protection given to the Personal Data applies regardless of whether the Personal Data is related to an EU resident or not. Organisations must renew their "membership" to the Privacy Shield on an annual basis. If they do not, they can no longer receive and use Personal Data from the EU under that framework.

10.1.3 Binding corporate rules

DPO has adopted corporate rules for the transfer of data outside the EU. These are outlined in the DPO GDPR Transfer of Personal Data to Third Countries, and submitted to the Irish Supervisory Authority for approval of the rules that DPO rely upon.

10.1.4 Processing of personal data outside Uganda

Direct Pay (U) Ltd is committed to observing the laws that govern the processing of data outside Uganda as referenced in Section 30 of the Data Protection and Privacy Regulations, 2021.

1. Direct Pay (U) Ltd shall ensure the below;
 - (i) It shall demonstrate to the office of the data commissioner that;
 - (ii) That the country outside Uganda where the personal data is to be processed or stored has adequate measures in place for the protection of the personal data at least equivalent to the protection provided for by the Data Protection and Privacy regulations 2021 or
 - (iii) That the data subject has consented to the processing or storing of personal data outside Uganda.
2. Any personal data processed outside Uganda in accordance to subregulation (1) of Section 30 of the Data Protection and Privacy Regulations, 2021, shall not be further transferred to, or processed in a third country without the express consent of the data subject.
3. The consent of the data subject required under Section 19(1) of the Data Protection and Privacy Regulations, 2021, shall be obtained in manner and form that takes into consideration the nature of the personal data sought to be processed or stored outside Uganda.
4. Direct Pay (U) Ltd, shall for the purposes of Section 19(1) of the Data Protection and Privacy Regulations, 2021 specify by notice in The Uganda Gazette, the countries which have adequate measures in place for the protection of the personal data at least equivalent to the protection required in the aforementioned Act.

5. If Direct Pay (U) will want to process or store personal data in a country that does not appear on the list of countries referred to in Section 19(3) the Data Protection and Privacy Regulations, it is the responsibility of the data collector, data processor or data controller to prove that that country has adequate measures in place for the protection of the personal data at least equivalent to the protection provided for by the Act.

10.15 Exceptions

In the absence of an adequacy decision, Privacy Shield membership, binding corporate rules and/or model contract clauses, a transfer of Personal Data to a third country or international organisation shall only take place on one of the following conditions:

- the Data Subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the Data Subject due to the absence of an adequacy decision and appropriate safeguards;
- the transfer is necessary for the performance of a contract between the Data Subject and the controller or the implementation of pre-contractual measures taken at the Data Subject's request/consent;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject between the controller and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for the Establishment, exercise or defence of legal claims; and/or
- the transfer is necessary in order to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of giving consent.

11. Information asset register/data inventory

11.1 DPO has established a data inventory and data flow process as part of its approach to address risks and opportunities throughout its GDPR compliance project. DPO's data inventory and data flow determines:

- business processes that use Personal Data;
- source of Personal Data;

volume of Data Subjects;

description of each item of Personal Data;
Processing activity;

maintains the inventory of data categories of Personal Data processed;

documents the purpose(s) for which each category of Personal Data is used;
recipients, and potential recipients, of the Personal Data;

the role of the DPO throughout the data flow; key
systems and repositories;

any data transfers; and

all retention and disposal requirements.

11.2 DPO is aware of any risks associated with the Processing of particular types of Personal Data.

11.2.1 DPO assesses the level of risk to individuals associated with the Processing of their Personal Data. Data protection impact assessments (DPIAs) are carried out in relation to the Processing of Personal Data by DPO, and in relation to Processing undertaken by other organisations on behalf of DPO.

11.2.2 DPO shall manage any risks identified by the risk assessment in order to reduce the likelihood of a non-conformance with this policy.

11.2.3 Where a type of Processing, in particular using new technologies and taking into account the nature, scope, context and purposes of the Processing is likely to result in a high risk to the rights and freedoms of natural persons, DPO shall, prior to the Processing, carry out a DPIA of the impact of the envisaged Processing operations on the protection of Personal Data. A single DPIA may address a set of similar Processing operations that present similar high risks.

11.2.4 Where, as a result of a DPIA it is clear that DPO is about to commence Processing of Personal Data that could cause damage and/or distress to the Data Subjects, the decision as to whether or not DPO may proceed must be escalated for review to the Data Protection Officer.

11.2.5 The Data Protection Officer shall if there are significant concerns, either as to the potential damage or distress, or the quantity of data concerned, escalate the matter to the supervisory authority.

11.2.6 Appropriate controls will be selected and applied to reduce the level of risk associated with Processing individual data to an acceptable level, by reference to DPO's documented risk acceptance criteria and the requirements of the GDPR.

DATA PROTECTION POLICY for DIRECT PAY (U) LTD.

Document Control
Reference: DPO GDPR Data
Protection Policy
Issue No: V1.3a
Issue Date: Sept 2021
Page: 13 of 13

12. Notification of data security breaches

12.1 Direct Pay (U) Ltd shall handle notification of data breaches as per Section 23 (1) of the Data Protection and Privacy Regulations. The notification shall be done immediately after the occurrence of the breach.

The form to be used to submit the breach is attached on Appendix 1 and is derived from Form 7 as found in Schedule 1 the Data Protection and Privacy Regulations.

Details to be input in the attached breach notification form are;

- (i) the nature of the personal data breach;
- (ii) the personal data which is the subject of the data breach;
- (iii) the categories and approximate number of data subjects affected by the personal data breach;
- (iv) affected by the personal data breach;
- (v) the likely consequences of the personal data breach;
- (vi) the appropriate remedial measures taken or proposed to address the personal data breach; and
- (vii) address the personal data breach; and
- (viii) the name and contact details of the data protection officer
- (ix) or other point of contact.

The Data Protection Officer with effect from 7th September 2018 is Wouter Uitzinger who, in his capacity as Employee of DPO Group, is responsible for ensuring that this policy is reviewed and updated annually as required.

A current version of this document is available to all members of staff on the DPO share point and is published annually.

This policy was approved by the Board of Directors on 7th September 2018 and is issued on a version controlled basis under the signature of the Chief Executive Officer (CEO).

This issue is issue version no. V1.3a, reviewed in September 2021.

Document Owner and Approval

Signature: 

Eran Feinstein -CEO

Date: 10 December 2021

Change History Record

Issue	Description of Change	Date of Issue
V1.0	Initial issue Wouter Uitzinger	31 July 2018
V1.1	Minor update for Board Approval Wouter Uitzinger	30 August 2018
V1.2	Review by Shlomi Bardugo	4 September 2018
V1.3	Reviewed by W Uitzinger (No changes)	12 September 2019

APPENDIX 1 : BREACH NOTIFICATION FORM

NOTIFICATION OF DATA BREACH

1. Details of person making notification

First Name: Last Name: Address:
E-mail address: Phone Number:

2. Details of Data Breach

- a) When did the breach happen?
 - b) How did the breach happen?
 - c) If there has been a delay in reporting the breach please explain the reasons for this
 - d) What measures were in place to prevent an breach of this nature occurring?
 - e) Please provide extracts from any policies or procedures considered relevant to this breach, and explain which of these were in existence at the time of this breach. Please provide the dates on which they were implemented.
- Personal data placed at risk
- f) What personal data has been placed at risk? Please specify if any financial or sensitive personal data (special categories*) has been affected and provide details of the extent.
 - g) How many data subjects have been affected and how many data records are involved?
 - h) Are the affected individuals aware that the breach has occurred?
 - i) What are the potential consequences and adverse effects on those individuals?
 - j) Have any affected individuals complained to the University about the breach?

Containment and recovery

- k) Has any action been taken to minimise/mitigate the effect on the affected data subjects? If so, please provide details.
- 1) Has the data placed at risk now been recovered? If so, please provide details of how and when this occurred.
- m) What steps have been taken to prevent a recurrence of this breach?

Miscellaneous

- n) Have the police or any other regulatory bodies been informed about this breach?
- o) Has there been any media coverage of the breach?

Special Categories of Personal data include:

The racial or ethnic origin of the data subject Their political opinions

Their religious or philosophical beliefs

Whether they are a member of a trade union Their genetic data

Biometric data used to uniquely identify them Their physical or mental health or condition Their sex life or sexual orientation

Date

Signature of person making notification