

Data Protection Policy

1. Introduction

Strategic Linkages for Sustainability (SLiS) is committed to protecting the privacy and personal data of all stakeholders, including children, parents, staff, donors, and partners. This policy outlines our approach to compliance with the Data Protection and Privacy Act, Cap.97.

2. Purpose of the Policy

To establish clear principles, procedures, and responsibilities for the collection, processing, storage, and disposal of personal data, ensuring transparency, accountability, and trust.

3. Scope of the Policy

Applies to all SLiS departments, employees, contractors, volunteers, and third-parties who handle personal data in connection with SLiS operations.

4. Key Definitions

Data Controller: shall mean SLiS, who shall be responsible for determining the purpose and means of processing personal data.

Data Processor: shall mean any third party processing data on behalf of SLiS.

Data Subject: shall mean a natural person or otherwise whose data is obtained in fulfilment of the objectives and mandate by SLiS.

Consent: shall mean freely given, informed, and explicit agreement by a data subject for the collection of his/her personal data for lawful purposes by SLiS as per its mandate and objectives.

Breach: shall mean unauthorized access, disclosure, alteration, or destruction of personal data. DPPA or the Act shall mean Data Protection & Privacy Act Cap 97.

5. Data Protection Principles

SLiS adheres to principles under Section 3 of the Data Protection & Privacy Act Cap 97: lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality, and accountability.

6. Data Collection and Processing Activities

SLiS shall collect and process data for: Child sponsorship and welfare programs, Staff and volunteer management, SLiS Directors, Donor and partner engagement, Financial and operational reporting, and Compliance with statutory obligations for legitimate SLiS interests in line with its mandate and objectives.

7. Types of Personal Data Collected

Identification data (names, dates of birth, national IDs); Contact details (addresses, phone numbers, emails); Educational and health records (for sponsored children); Employment and financial information (for staff and partners) and such other lawful data required in pursuit of SLiS mandate and objectives.

8. Rights of Data Subjects

Data subjects have the right to: Access their personal data; Request correction or deletion; Withdraw consent; Object to processing; and Lodge complaints with the National Information Technology Authority (NITA-U).

9. Procedures for Exercising Rights & Complaints

Requests and complaints must be submitted in writing to the Data Protection Officer (DPO). SLiS will respond within 30 days. Complaints are handled through an internal review process before escalation to NITA-U.

10. Security Measures

Encryption of digital records; Secure physical storage of paper files; Access controls and authentication protocols; and Regular staff training on data privacy

11. Data Breach Management

Breaches are reported immediately to the DPO. SLiS will notify affected individuals and NITA-U within 72 hours, outlining corrective measures.

12. Data Retention

Personal data is retained only as long as necessary:

Child sponsorship records: until program completion + 5 years

Employment records: duration of employment + 7 years

Donor records: duration of relationship + 5 years

13. Disposal Procedures

Secure shredding of paper records and certified digital deletion methods are used to dispose of personal data.

14. Responsibilities

Board of Directors: Oversight and approval

Management: Implementation and monitoring

Employees: Compliance with procedures

DPO: Policy enforcement, training, and reporting

Third Parties: Compliance through contractual agreements

15. Data Sharing Procedures

Data sharing occurs only under formal agreements ensuring compliance with the Act. Cross-border transfers require explicit consent and safeguards.

16. Contact Details of the DPO

Data Protection Officer, SLiS

Email: info@slisuganda.org and cc osirefaith613@gmail.com

Tel: +256-703 243 770

17. Review Dates

This policy shall be reviewed annually and upon significant regulatory changes.

18. Implementation and monitoring

This policy will take effect from 29th May 2026, and SLiS will aim to have put all necessary procedures in place before that date. SLiS will further provide ongoing training to its personnel to ensure effective implementation. Implementation of this policy will be the responsibility of all personnel.

The DPO will be required to monitor compliance with this policy on an ongoing basis. Some of this monitoring will be relatively informal; however, compliance with this policy is expected to be formally reviewed as set out in 17 above. Where issues arise, the same may be scheduled

for more frequent review. The results of all formal compliance reviews will be documented. They will be reported as follows:

- In each individual case to the Directors of SLiS.
- An annual summary to the Directors of SLiS.

19. Approval

Approved by the Board of Directors of Strategic Linkages for Sustainability on 29th May 2026.

Signed by

Chairperson, Board of Directors



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Board Secretary



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