



DATA PROTECTION AND PRIVACY POLICY

2026

NON-PROFIT ORGANISATION | KAMPALA, UGANDA

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1. Purpose and Commitment

NAMBI FOUNDATION is a non-profit organisation committed to protecting the privacy, dignity and personal information of the people who engage with our work.

This Policy explains how NAMBI FOUNDATION collects, uses, stores, shares and protects personal data in connection with its humanitarian, charitable, community, fundraising and organisational activities.

We aim to collect only the information that is reasonably necessary for a clear purpose, use it responsibly, keep it secure and retain it only for as long as there is a legitimate reason to do so.

2. Applicable Data Protection Framework

NAMBI FOUNDATION processes personal data in accordance with applicable data protection and privacy requirements, including Uganda's Data Protection and Privacy Act, 2019 and the Data Protection and Privacy Regulations, 2021.

Where a particular programme, donor relationship, service provider or activity is subject to additional data protection requirements in another jurisdiction, NAMBI FOUNDATION will take reasonable steps to comply with those requirements as well.

3. Who Is Responsible for Your Personal Data

NAMBI FOUNDATION is the data controller responsible for determining why and how personal data is processed in connection with its activities, unless a specific notice states otherwise.

NAMBI FOUNDATION

Kampala Office

Windsor Crescent, Windsor Apartments

4th Floor, Apartment No. 7

Kololo, Kampala, Uganda

Registration Number: 80034388187129

For questions about this Policy, the use of your personal data or the exercise of your data protection rights, please contact:

- Email: info@nambifoundation.com

4. Our Data Protection Principles

NAMBI FOUNDATION seeks to handle personal data in accordance with the following principles:

Lawfulness and fairness

Personal data should be collected and used only where there is a lawful and fair reason to do so.

Transparency

People should be given clear information about how their personal data will be used, where reasonably possible.

Purpose limitation

Personal data should be collected for specific and legitimate purposes and should not be used in a manner that is incompatible with those purposes without an appropriate legal basis.

Data minimisation

We seek to collect only the personal data reasonably necessary for the relevant activity.

Accuracy

Reasonable steps should be taken to keep important personal data accurate and up to date.

Storage limitation

Personal data should not be retained for longer than necessary for the purpose for which it was collected, subject to legal, contractual, donor and accountability requirements.

Security and confidentiality

Personal data should be protected against unauthorised access, misuse, alteration, accidental loss or disclosure through appropriate organisational and technical measures.

Accountability

NAMBI FOUNDATION is responsible for applying these principles throughout its operations and for reviewing its data protection practices as its activities develop.

5. What We Mean by Personal Data

Personal data is information that identifies a person or can reasonably be linked to an identifiable individual.

Depending on the circumstances, this may include:

- names and identification details
- contact information, including address, telephone number and email address
- age or date of birth
- photographs, video or audio recordings
- application, registration or programme information
- employment, volunteering or professional information
- payment, donation and transaction information
- correspondence with NAMBI FOUNDATION
- online identifiers, device information, IP addresses and website usage information; and
- other information required to administer a programme, partnership, donation, event or service.

6. Sensitive and Special Personal Data

Some personal information requires additional care because disclosure or misuse could create a greater risk to the individual.

Depending on our programmes, NAMBI FOUNDATION may occasionally need to process information relating to matters such as health, disability, financial circumstances, biometric information, religious beliefs, ethnicity or other sensitive personal circumstances.

We will seek to collect such information only where it is genuinely necessary, where an appropriate lawful basis exists and where additional safeguards can reasonably be applied.

Sensitive information should not be requested merely because it may be useful. The need for it should be connected to a specific programme, safeguarding, medical, legal, administrative or humanitarian purpose.

7. How We Obtain Personal Data

NAMBI FOUNDATION usually receives personal data directly from the individual concerned, for example when a person:

- contacts us
- makes a donation
- applies for or participates in a programme
- registers for an event
- subscribes to communications
- applies for employment or volunteering
- enters into a contract or partnership with us; or
- provides information during the delivery or evaluation of our activities.

In appropriate circumstances, information may also be obtained from partner organisations, service providers, public authorities, donors, community representatives, emergency responders or publicly available sources where this is lawful and relevant to our work.

8. When Providing Personal Data Is Necessary

In many situations, providing personal data is voluntary.

However, some information may be necessary for NAMBI FOUNDATION to carry out a requested activity. For example, we may need certain information to process a donation, assess eligibility for programme support, register a participant, enter into an agreement, recruit a volunteer or employee, comply with legal obligations or protect a person from harm.

If required information is not provided, we may be unable to complete the relevant request or provide the intended service or support.

9. Lawful Grounds for Processing

NAMBI FOUNDATION processes personal data only where there is an appropriate lawful ground under applicable data protection law.

Depending on the activity, processing may be based on:

- consent provided by the individual
- the performance of a contract or steps requested before entering into a contract
- compliance with a legal obligation
- medical or health-related purposes where permitted by law
- an authorised or legally required public-interest or protection purpose
- another lawful ground available under applicable data protection legislation or regulations; or
- circumstances in which processing is necessary to protect people, prevent wrongdoing or meet other recognised legal obligations.
- Where processing relies on consent, the individual may withdraw that consent, subject to any other lawful reason that allows or requires continued processing.

10. Donors and Supporters

When a person supports NAMBI FOUNDATION financially, we may process information such as their name, contact details, payment information, donation history and correspondence with us.

We use this information to:

- receive and record donations
- issue acknowledgements or receipts where appropriate
- maintain accurate financial and accounting records
- meet legal, audit and donor-accountability requirements

respond to donor enquiries; and

communicate about our work where the individual has agreed to receive such communication or where another lawful basis applies.

Payment card or banking information may be processed through external payment providers. NAMBI FOUNDATION should avoid retaining full payment-card details where they are not required for our own records.

11. Programme Participants and Recipients of Support

NAMBI FOUNDATION may process personal data about people participating in or receiving support through our humanitarian, charitable or community programmes.

The information collected will depend on the programme and may include identification and contact information, household information, eligibility information, safeguarding information, information necessary to deliver assistance and, where genuinely required, sensitive personal data.

We may use this information to:

- assess eligibility or needs
- organise and deliver assistance or programme activities
- communicate with participants
- protect health, safety and wellbeing
- prevent duplication, misuse or fraud
- monitor and evaluate programme effectiveness
- meet reasonable donor, audit or legal requirements; and
- improve future programmes.
- Where possible, reporting and evaluation should use aggregated, anonymised or minimised information rather than unnecessary identifiable data.

12. Volunteers, Employees and Job Applicants

NAMBI FOUNDATION may process personal data relating to applicants, employees, interns, volunteers, consultants and other people working with the Foundation.

This may include information contained in applications or CVs, contact details, qualifications, references, employment history, identification information, contractual records, payment information and safeguarding or background-check information where relevant and lawful.

We process this information for purposes such as recruitment, selection, onboarding, administration, safeguarding, training, performance management, contractual management and compliance with legal

obligations.

Information relating to unsuccessful applicants should be retained only for an appropriate period, unless the individual has agreed that NAMBI FOUNDATION may keep it for consideration in future opportunities.

13. Partners, Suppliers and Service Providers

NAMBI FOUNDATION may process personal data relating to representatives, employees and contact persons of partner organisations, suppliers, professional advisers, contractors and other service providers.

This information may be used to:

- assess and establish working relationships
- carry out due diligence
- manage contracts and projects
- process invoices and payments
- communicate about services and responsibilities

monitor performance; and

meet legal, safeguarding, audit and financial-control requirements.

14. Website Visitors and Online Forms

When people use NAMBI FOUNDATION websites or online services, we may receive technical information such as IP address, device type, browser information, page activity, cookie choices and information voluntarily entered into forms.

We may use this information to:

- operate and secure the website
- respond to enquiries
- remember user preferences
- prevent spam, fraud or technical abuse
- understand how the website is used; and
- improve content and functionality.
- Where non-essential analytics, advertising or similar technologies require consent, they should not be activated until the required consent has been obtained.

15. Cookies and Similar Technologies

Cookies are small files or similar technologies that may be used to enable website functions, remember preferences or understand how visitors interact with online content.

Essential technologies may be used where they are necessary for the operation or security of the website.

Analytics, marketing or other non-essential technologies should be used only in accordance with applicable consent and transparency requirements.

Where a cookie-management tool is available, users should be able to review and update their choices

through that tool.

16. Email Updates and Newsletters

If you subscribe to NAMBI FOUNDATION news or updates, we may process your name, email address and communication preferences.

We use this information to send relevant news, programme information, event invitations, fundraising updates or other communications connected with our non-profit activities.

You may unsubscribe or withdraw consent using the method provided in the communication or by contacting info@nambifoundation.com.

17. Contacting NAMBI FOUNDATION

When you contact NAMBI FOUNDATION by email, telephone, web form, social media or another channel, we may process your contact details and the content of the communication.

We use this information to understand and respond to your enquiry, request, complaint, feedback or other communication and to maintain an appropriate record where necessary.

18. Events, Photography and Video

NAMBI FOUNDATION may organise or participate in public, community, fundraising, educational or programme events where photographs, video or audio recordings may be created.

Where reasonably possible, people should be informed when photography or filming is taking place.

Images and recordings may be used to document activities, communicate the Foundation's work, prepare reports, support fundraising, inform donors or publish content on websites and social media.

NAMBI FOUNDATION will seek to use photographs and stories in a respectful manner and in accordance with safeguarding requirements. Where a person can be individually identified and the context is sensitive, additional consent or safeguards may be required.

Children's images and stories must be handled in accordance with the NAMBI FOUNDATION Safeguarding Policy and applicable consent requirements.

19. Social Media

When you interact with NAMBI FOUNDATION through social media, we may receive information that you choose to make available through that platform, such as your name, profile details, comments, reactions or direct messages.

We may use this information to communicate with you, respond to enquiries, moderate our pages and understand engagement with our public communications.

Social media companies independently process personal data under their own privacy terms. NAMBI FOUNDATION does not control all data processing performed by those platforms.

20. Sharing Personal Data

NAMBI FOUNDATION does not sell personal data.

Personal data may be shared only where there is a legitimate and lawful reason to do so and only to the extent reasonably necessary.

Possible recipients may include:

- employees, volunteers or consultants who require access for their work
- programme and implementing partners
- IT, cloud, communications, payment, accounting, audit, legal or other professional service providers
- donors or funding partners where reporting obligations require relevant information
- banks and payment processors
- safeguarding, medical or protection services where necessary to protect an individual; and
- courts, regulators, law-enforcement agencies or other public authorities where disclosure is required or authorised by law.
- Where possible, NAMBI FOUNDATION will use aggregated or anonymised information when identifiable personal data is not necessary.

21. Service Providers and Data Processors

Where another organisation processes personal data on behalf of NAMBI FOUNDATION, we seek to use service providers that can provide appropriate assurances regarding confidentiality and data security.

Where required, contractual arrangements should define the purpose of processing, security expectations, confidentiality requirements and the provider's responsibilities regarding personal data.

Service providers should not use personal data entrusted to them by NAMBI FOUNDATION for unrelated purposes unless independently authorised by law.

22. Transfers Outside Uganda

Some programmes, partners, donors, technology providers or service providers may involve the transfer or remote access of personal data outside Uganda.

Before transferring personal data internationally, NAMBI FOUNDATION will consider the nature of the information, the purpose of the transfer, the safeguards available and the level of protection in the receiving jurisdiction.

Where required by applicable law, international transfers will take place only with appropriate consent, contractual safeguards, equivalent protection or another legally permitted transfer mechanism.

23. How Long We Keep Personal Data

NAMBI FOUNDATION retains personal data only for as long as reasonably necessary for the purpose for which it was collected or for another lawful reason.

Retention periods may depend on:

- the nature of the programme or activity

- legal and regulatory obligations
- accounting and audit requirements
- donor or grant conditions
- contractual obligations
- safeguarding requirements
- the need to resolve disputes or protect legal rights; and
- the sensitivity and risk associated with the information.
- When identifiable personal data is no longer needed, it should be securely deleted, destroyed or anonymised where reasonably practicable.

24. How We Protect Personal Data

NAMBI FOUNDATION takes reasonable organisational and technical measures to protect personal data from accidental loss, unauthorised access, disclosure, alteration or misuse.

Depending on the circumstances, safeguards may include:

- access controls and password protection
- restricted access to sensitive records
- secure physical storage
- confidentiality obligations
- staff awareness and training
- secure backups
- appropriate technical security measures

careful selection of service providers; and

procedures for responding to data incidents.

- No system can eliminate every risk, but NAMBI FOUNDATION seeks to maintain safeguards proportionate to the sensitivity of the data and the nature of the processing.

25. Children and People at Increased Risk

NAMBI FOUNDATION recognises that personal data relating to children and people in vulnerable circumstances may require additional protection.

We seek to collect only information necessary for legitimate programme, safeguarding or administrative purposes and to obtain consent from a parent, guardian or other authorised person where required by law and appropriate to the circumstances.

Information concerning children must not be published, shared or used in a manner that creates unnecessary safety, dignity or safeguarding risks.

26. Data Accuracy

NAMBI FOUNDATION seeks to keep personal data accurate and reasonably up to date where accuracy is important to the purpose for which the information is used.

Individuals are encouraged to inform us if important information we hold about them is incorrect or has changed.

27. Your Data Protection Rights

Subject to applicable law and any relevant limitations, you may have rights in relation to your personal data, including the right to:

- ask whether NAMBI FOUNDATION holds personal data about you
 - request access to personal data held about you
 - request correction of inaccurate or incomplete information
 - request deletion or erasure where the legal requirements are met
 - object to or request the stopping of certain processing in circumstances recognised by law
 - withdraw consent where processing is based on consent; and
 - raise a concern about the way your personal data has been handled.
- To exercise a data protection right, contact info@nambifoundation.com.
- We may need to verify your identity before disclosing, changing or deleting personal data in order to protect the information from unauthorised access.

28. Complaints and the Personal Data Protection Office

If you have a concern about how NAMBI FOUNDATION has handled your personal data, we encourage you to contact us first at info@nambifoundation.com so that we can review the matter and respond appropriately.

You may also have the right to submit a complaint to Uganda's Personal Data Protection Office, the independent authority responsible for oversight and enforcement of the Data Protection and Privacy Act.

Personal Data Protection Office Kampala, Uganda Website: www.pdpo.go.ug Email: info@pdpo.go.ug

29. Data Security Incidents and Breaches

NAMBI FOUNDATION seeks to identify and respond promptly to incidents involving the accidental or unlawful loss, destruction, alteration, disclosure of or access to personal data.

When a significant personal data breach occurs, we will take reasonable steps to contain the incident, assess the potential impact, preserve relevant information and reduce the risk of further harm.

Where applicable law requires notification to the Personal Data Protection Office, affected individuals or another authority, NAMBI FOUNDATION will make the required notification in accordance with the applicable rules.

30. Automated Decision-Making

NAMBI FOUNDATION does not intend to rely on decisions made solely by automated processing where those decisions would have a significant legal or similarly serious effect on an individual, unless such processing is lawful, necessary and appropriately explained to the affected person.

If this practice changes for a particular programme or service, additional information should be provided to the people affected.

31. Accountability and Staff Responsibilities

Anyone who handles personal data on behalf of NAMBI FOUNDATION is expected to treat it responsibly and confidentially.

Personnel should:

- access personal data only where needed for their role
- avoid collecting unnecessary information
- use approved storage and communication methods
- report suspected loss, unauthorised access or disclosure promptly

follow safeguarding and confidentiality requirements; and

seek guidance where they are uncertain about the appropriate use of personal data.

32. Changes to This Policy

NAMBI FOUNDATION may update this Policy when our programmes, technologies, legal obligations or data-processing practices change.

The current version should be made available through the Foundation's official communication channels or website.

Last updated: September 2026