

COMPANY LOGO

XYZ UGANDA LIMITED

**Annual Data Protection and Privacy
Compliance Report
to
Personal Data Protection Office
(PDPO)**

July 2023

1. INTRODUCTION

1.1 Background

The Personal Data Protection Office (PDPO) was established to, among others, oversee the implementation of and be responsible for the enforcement of the Data Protection and Privacy Act and regulations thereunder. Under regulation 50, every data collector, data processor and data controller registered under these Regulations shall within ninety (90) days after the end of every financial year, submit to the Personal Data Protection Office a summary of –

- (a) all complaints received and the status of such complaints, including whether the complaint was resolved or is still pending; and
- (b) all data breaches and the action taken to address such data breaches.

Regulation 4(b) of the Data Protection and Privacy Regulations mandates PDPO to coordinate, supervise and monitor data collectors, data processors and data controllers on all matters relating to the Act. To this end, PDPO will monitor the said persons by expanding the scope of the annual compliance report to ensure the desired levels of compliance are reached.

The financial year of PDPO is the same as that of Government that runs from 1st July to 30th June as stipulated by section 30 of the National Information Technology Authority, Uganda (NITA-U) Act of 2009. In adherence to this requirement, XYZ Uganda Limited hereby submits its annual Data Protection and Privacy compliance report to PDPO.

1.2 Overview of organisation's compliance efforts

Provide an overview of the organisation's operations, encompassing its respective business activities or Government mandate, along with the steps you have undertaken to ensure compliance with the Data Protection and Privacy Act and the accompanying Regulations.

Additionally, provide the month and year within which your organization will submit the report.

2. REGISTRATION WITH PERSONAL DATA PROTECTION OFFICE

2.1 RENEWAL STATUS

XYZ Uganda Limited was registered on 25th November 2021 as a data collector/data processor/data controller under registration number PDPO-202111-0001. The date for renewal of its registration is upcoming (provide specific date) OR state that it has expired.

2.2 CHANGES IN REGISTERED PARTICULARS

XYZ Uganda Limited has made the following changes in its registered particulars:

2.2.1 Details of applicant

- a) The organisation has a new physical address located at Lugogo Bypass, Kampala Uganda.
- b) The organisation's nature of business was expanded to include

3. LEADERSHIP AND OVERSIGHT

3.1 Reporting line and team of staff supporting Data Protection Officer

The Data Protection Officer (DPO) reports to the Director Audit and Assurance. The DPO has a team of three members of staff that support him/her in the role. These hold the following positions a) Legal Officer, b) Risk Analyst and c) Internal Auditor.

3.2 Job description of the Data Protection Officer

Does the DPO have a job description addressing specific responsibilities as detailed in Regulation 47(3) of the Data Protection and Privacy Regulations?

3.3 Does the most recent performance appraisal of the DPO encompass responsibilities set out by Regulations 47(3)?

4. NOTICES, POLICIES AND PROCEDURES

XYZ Uganda Limited's management approved the following notices/statements/disclosures, policies and procedures which are available to all staff in the policies and procedures section of the shared folder on the intranet and data subjects for notices/statements/disclosures.

No.	Policy/Notice Title	Date of Approval	Date of Review	Date of Trainings Conducted on Policy/Notice
1.	Data Protection and Privacy Notice/statement/disclosure	10 th April 2021	9 th January 2023	5
2.	Data Protection and Privacy Policy	27 th May 2023	Not applicable	10
3.	Information Security Policy	3 rd June 2021	4 th May 2023	8
4.	Records Management	12 th July 2022	Not applicable	8

5. TRAINING AND AWARENESS

Training and awareness make sure that all staff, third parties, contractors and agents receive appropriate training about the organisation's data protection and privacy commitments in its policies and notices, including what they require one to do and what responsibilities they have.

5.1 Data Protection and Privacy Trainings attended by the DPO

No.	Title of Training	Conducted by	Date of Training
1.	Demystifying data mapping: Why it matters and how to do it well	Privacy Consultants	2 nd October 2022

5.2 Data Protection and Privacy Trainings Conducted by DPO for Staff

No.	Department	Total staff to be trained	No. of staff that completed training
1.	Human Resources	10	5

5.3 Agents/Third parties/Contractors

No.	Agent/Third party/Contractor	Total no. to be trained	No. that completed training
1.	Mobile Money Agents	2000	500

5.4 Commemoration of the International Data Privacy Day

Provide a comprehensive report on how your organization observed the International Data Privacy Month. This report should detail the initiatives undertaken to enhance awareness of the Ugandan Data Protection and Privacy Act, along with its Regulations, among staff, third-party contractors/agents, and customers. It is imperative that the report not only addresses the awareness of the legislation but also encompasses the data protection and privacy commitments asserted by your organization in its policies and notices. Please ensure to attach any relevant photographic evidence supporting these activities.

6. COMPLAINTS RELATED TO DATA PROTECTION AND PRIVACY

The Data Protection and Privacy Act empowers a data subject or any person who believes that a data collector, data processor or data controller is infringing upon their rights or is in violation of the Act to make a complaint. PDPO's [guidance note](#) on lodging complaints with the Office requires that a complaint is brought to the attention of the organisation before it is submitted to the Office.

Below is the summary of complaints made to XYZ Uganda Limited within the reporting period.

No.	No. of Complaints Received	Year of Complaints Reception	Complaints Status
1.	50	2022	<ul style="list-style-type: none"> • 40 – Resolved • 10 – Pending resolution

The most frequent complaint received was in relation to clients requesting for options on how to unsubscribe from the organisation’s marketing messages. thirty (30) of such complaints were received and 96% of them resolved.

7. DATA SECURITY BREACHES

The Data Protection and Privacy Act requires every data collector, data processor or data controller to immediately notify PDPO after the occurrence of a data security breach. Below is the summary of all data security breaches experienced by XYZ Uganda Limited and the action taken to address them.

No.	No. of Breaches experienced	Year Breach occurred	Breach Status
1.	10	2022	<ul style="list-style-type: none"> • 40 – Resolved • 10 – Pending resolution

The most frequent cause of data security breach was which resulted in loss of records/.... amount of money lost.

Organizations are also required to provide information on the measures they have taken to address gaps that contributed to data security breaches. This includes outlining the remedial actions implemented by management to prevent future breaches.

8. DATA PROTECTION IMPACT ASSESSMENT (IF APPLICABLE)

The Data Protection and Privacy Regulations require a Data Protection Impact Assessment to be carried out where the collection or processing of personal data poses a high risk to the rights and freedoms of the data subjects. The following Data Protection Impact Assessments were carried this reporting year.

No.	Data collection/processing activity	Date Data Protection Impact assessment concluded
1.	Deployment of CCTV cameras	3 rd January 2022
2.	Processing of location data on a large scale, such as a mobile app that enables collection of users' geolocation data, etc.	28 th November 2021

9. DATA PROTECTION AND PRIVACY AUDITS

The Data Protection and Privacy Regulations require the Data Protection Officer to conduct regular assessments and audits to ensure compliance with the Act. Below are the assessments and audits that were conducted this reporting year.

No.	Category of assessment/audit	Number of assessments/audits	Percentage of implementation of recommendations
1.	Internal	1	70%
2.	External/independent, including one from PDPO	2	72%

10. CONCLUSION

List here major take-ways, general observations and challenges in relation to ensuring compliance with the Data Protection and Privacy Act in your organisation.

Declaration

I, [Name of the Data Protection Officer or Managing Director or Company Secretary], on behalf of [Organization Name], hereby declare that the information provided in this Data Protection and Privacy Annual Compliance Report is accurate, complete, and up-to-date to the best of my knowledge.

NAME OF PERSON SUBMITTING THE REPORT:

TITLE OF PERSON SUBMITTING THE REPORT:

SIGNATURE OF PERSON SUBMITTING REPORT:

DATE REPORT SUBMITTED TO PDPO:

TEMPLATE