



DATA PROTECTION AND PRIVACY POLICY FOR THE EPIC COMMUNICATIONS BPO LTD (EPICOM)

Effective Date: 1st Nov 2025

1. Introduction

EPICOM BPO Ltd is committed to protecting the privacy and personal data of its clients, partners and stakeholders. This Data Protection and Privacy Policy outlines how EPICOM collects, uses, stores, and safeguards personal information in compliance with the Uganda Data Protection and Privacy Act, 2019 and other applicable laws and regulations.

This policy applies to all personal data collected through the Clients databases, Data entry forms, events, surveys, elections and any other interactions with EPICOM.

2. Definitions

- a. **Personal Data:** Any information relating to an identified or identifiable individual, such as name, email address, phone number, or identification number.
- b. **Data Subject:** The individual whose personal data is being processed (e.g., Clients, Databases, Online visitors).
- c. **Processing:** Any operation performed on personal data, including collection, storage, use, or dissemination.
- d. **Data Controller:** EPICOM, which determines the purposes and means of processing personal data.

3. Principles of Data Protection

EPICOM adheres to the following principles when processing personal data:

- A. **Lawfulness, Fairness, and Transparency:** Personal data is processed lawfully, fairly, and in a transparent manner.
- B. **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- C. **Data Minimisation:** Only the minimum amount of personal data necessary for the intended purpose is collected.
- D. **Accuracy:** Personal data is kept accurate and up-to-date.
- E. **Storage Limitation:** Personal data is retained only for as long as necessary for the purposes for which it was collected.
- F. **Integrity and Confidentiality:** Personal data is processed securely and protected against unauthorized access, loss, or damage.
- G. **Accountability:** EPICOM is responsible for demonstrating compliance with data protection principles.

4. Types of Personal Data Collected

EPICOM may collect the following types of personal data:

- ✓ **Contact Information:** Name, NIN, Occupation, email address, phone number, postal address.
- ✓ **Professional Information:** Job title, organization, industry, and professional qualifications.
- ✓ **Event Information:** Registration details, attendance records, and feedback.
- ✓ **Technical Information:** IP address, browser type, device information, and website usage data (collected via cookies).



5. Purposes of Processing Personal Data

EPICOM processes personal data for the following purposes:

- a. To manage client applications, database, and communications.
- b. To organise and manage events, workshops, and conferences.
- c. To send newsletters, updates, and promotional materials.
- d. To improve EPICOM's services and functionality.
- e. To comply with legal and regulatory obligations.

6. Legal Basis for Processing

EPICOM processes personal data based on one or more of the following legal grounds:

- ❖ **Consent:** The data subject has given explicit consent for specific purposes.
- ❖ **Contractual Necessity:** Processing is necessary for the performance of a contract.
- ❖ **Legitimate Interests:** Processing is necessary for EPICOM legitimate interests, provided these do not override the rights and freedoms of the data subject.
- ❖ **Legal Obligation:** Processing is necessary to comply with applicable laws.

7. Data Sharing and Disclosure

EPICOM may share personal data with third parties only in the following circumstances:

- **Service Providers:** Third-party vendors who assist EPICOM in providing services. These providers are contractually obligated to protect personal data.
- **Legal Requirements:** When required by law or to protect EPICOM's legal rights.
- **With Consent:** When the data subject has explicitly consented to the sharing of their data.

EPICOM does not sell or rent personal data to third parties.

8. Data Security

EPICOM implements appropriate technical and organisational measures to protect personal data from unauthorised access, alteration, disclosure, or destruction. These measures include:

- ✓ Encryption of sensitive data.
- ✓ Regular security assessments and updates.
- ✓ Restricted access to personal data on a need-to-know basis.
- ✓ Secure storage and disposal of physical and digital records.

9. Data Retention

EPICOM retains personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by law. Retention periods are determined based on the type of data and its purpose.



10. Data Subject Rights

Under the Uganda Data Protection and Privacy Act, 2019, data subjects have the following rights:

- 1) **Right to Access:** Request a copy of their personal data held by PRAU.
- 2) **Right to Rectification:** Request correction of inaccurate or incomplete data.
- 3) **Right to Erasure:** Request deletion of their personal data under certain conditions.
- 4) **Right to Restrict Processing:** Request restriction of processing under certain conditions.
- 5) **Right to Object:** Object to the processing of their personal data for specific purposes.
- 6) **Right to Data Portability:** Request transfer of their data to another organisation in a structured, commonly used format.

To exercise these rights, data subjects may contact EPICOM at 0778519894.

11. Cookies and Tracking Technologies

EPICOM's website uses cookies and similar technologies to enhance user experience and analyse website traffic. Users can manage cookie preferences through their browser settings.

12. International Data Transfers

If personal data is transferred outside Uganda, EPICOM ensures that adequate safeguards are in place to protect the data in accordance with applicable laws.

13. Changes to This Policy

EPICOM may update this policy from time to time to reflect changes in legal or regulatory requirements. The updated policy will be published on EPICOM's website, and significant changes will be communicated to data subjects.

14. Contact Information

For questions, concerns, or requests related to this Data Protection and Privacy Policy, please contact:

Epic Communications BPO LTD (EPICOM)

Address: Ntinda Uganda

Email: info@epicombpo.com

Phone: 0778519894

15. Governing Law

This policy is governed by the laws of Uganda, including the Data Protection and Privacy Act, 2019, and any disputes shall be resolved in accordance with these laws.

By adhering to this policy, EPICOM demonstrates its commitment to protecting the privacy and personal data of its stakeholders while fostering trust and transparency in its operations.