

COMPANY LOGO

XYZ UGANDA LIMITED

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

July 2022

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.

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

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.

4. POLICIES AND PROCEDURES

XYZ Uganda Limited's management approved the following policies and procedures which are available to all staff in the policies and procedures section of the shared folder on the intranet.

No.	Policies and Procedures	Approval Date	Review Date (If applicable)
1.	Data Protection and Privacy	27 th May 2021	Not applicable
2.	Information Security	3 rd June 2010	4 th May 2020
3.	Records Management	12 th July 2009	23 rd June 2021

5. TRAINING AND AWARENESS

The Data Protection Officer has participated in the following Data Protection and Privacy trainings:

- a) Data Protection Officer training on records management offered by WMK online on 23rd February 2022.

b) How to handle data protection complaints conducted by BKQ Limited on 1st June 2022.

The target for completion of Data Protection awareness was set at 90% of all staff. As of 1st July 2022, 85% of staff have completed the mandatory training. Below is the breakdown of the sessions conducted.

No.	Department/ Category	Total no. of staff required to undertake training	Total no. of staff who completed training	Percentage have completion
1.	Business Services	13	10	77
2.	Administration	20	17	85
3.	Senior Management	7	7	100
	Total	40	34	85

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.	Status of Complaints	Number received
1.	Resolved	73
2.	Pending resolution	27
	Total complaints received	100

The most frequent complaint received was in relation to clients requesting for options on how to unsubscribe from the organisation’s marketing messages. Fifty (50) 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.	Status of breach	Number	Most frequent cause
1.	Reported to PDPO	10
2.	Resolved breaches	2
	Total recorded breaches	13	

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

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.

NAME OF PERSON SUBMITTING THE REPORT:

TITLE OF PERSON SUBMITTING THE REPORT:

SIGNATURE OF PERSON SUBMITTING REPORT:

DATE REPORT SUBMITTED TO PDPO: