

## **UGPASS PERSONAL DATA PROTECTION AND PRIVACY NOTICE**

This Data Protection and Privacy Notice applies to the Digital Authentication and Electronic Signatures Solution under the brand name: ugPass and also accessed via access via ugPass.go.ug and our mobile application. This Privacy Policy does not apply to any third-party websites and apps that you may use, including any linked to in as an e-service.

UgPass is an innovative service that leverages Public Key Infrastructure (PKI) to provide secure and trusted means for user authentication when accessing e-services and use of advanced electronic signatures. Mantra Technologies Limited is the 'Controller' for this service as defined in the Electronic Signatures Act (2011). POS Digicert SDN is the Certification Service Provider. Accordingly, the Certification Service Provider has put in place the necessary and appropriate technical and organization measures to safeguard personal data collected and processed during the provision of UgPass services in Uganda.

We recommend that you read this Data Protection & Privacy Notice to ensure you are fully informed.

### **Registration**

UgPass requires subscribers to register in order to use the service. Accordingly, UgPass includes functionality for a user to register in order to create a profile. This profile allows you access certain e-services that have integrated with UgPass for authentication and use of advanced electronic signatures.

The registration process requires an interested user to provide personal data that will be further validated to confirm it's accurate and to confirm liveness. The Electronic Signatures Act (2011) requires the Certification Service Provider to confirm the correctness of a prospective subscriber before digital certificates are issued out. This is the legal basis for the collection and processing of personal data provided by a subscriber during registration. The is in line with Section 7(2)(e) where collection of personal data is required for compliance with a legal obligation to which the data controller is subject.

### **The type and purpose of personal data we collect**

Here are the types and purposes of personal data required during the registration process:

- National ID Number, Passport Number in order to identify you and verify your identity
- Full names (first names and last names) in order to create your profile on UgPass
- E-mail address and mobile phone number in order to contact you (notifications and alerts) during the use of the service
- Selfie photo in order to perform a liveness check and verify for presence of a natural person while onboarding you.
- Automatic processing: we automatically process certain types of information. This includes verification of the National ID Number and photo with the National Identification and Registration Authority
- Contact information you provide when you contact the service desk.

In addition to the above, UgPass android and iOS mobile app utilizes the following permissions only when using the app: accessing network state and internet for uploading data when going through the onboard process, read storage for the app to access the picture taken during onboarding, camera for taking the selfie and picture of the identity document, location to determine where a user is onboarding from, NFC to read data from an ePassport and biometric features for app authentication.

## **Disclosure**

We do not sell personal data to any third party. UgPass only shares personal data with third parties in two ways. The first, National Identification Data is shared with the National Identification and Registration Authority in order to verify authenticity. Second, when you access a service that utilizes the UgPass services for authentication and advanced electronic signing. In this second use case, this happens only when you authorize such via the UgPass application using your Personal Identification Number (PIN) that only you know. POS Digicert SDN is based out of Malaysia in a certified Tier III and ISO 27001 Data Center for PKI as a service. The integration layer is hosted in Uganda in the Government of Uganda secure Data Center.

We use Google Firebase Cloud Messaging only for notification purposes and analyzing crash analytics in order to continuously improve performance of the app. More information on the Google Firebase Cloud Messaging platform data security measures can be found here - <https://firebase.google.com/support/privacy>

We may provide personal data to Law enforcement when required to do so as part of an investigation. In such circumstances, we will ensure that the personal data is shared in accordance with this Privacy Notice and as permitted by the Personal Data Protection and Privacy Act, 2013.

## **Protection of Personal Data**

Personal data is secured with the state of the art data security controls. The Certification Service Provider has implemented appropriate and audited information security controls to protect personal data on all platforms that support UgPass. In addition, UgPass has an experienced support team that maintains the operational security (technical and organizational) measures for this website.

Whereas we protect this personal data, we strongly advise all subscribers to protect their account information against unauthorized access and use.

## **Your Rights**

The Personal Data Protection and Privacy Act (2019) provides for data subject rights which includes the following:

- The right to access personal data
- The right to prevent processing of personal data
- The right for correction of personal data
- The right to file a complaint against breach and non-compliance

If you would like more information as per your rights or to submit a request in line with the provided data subject rights, contact us via [dpo@ugpass.go.ug](mailto:dpo@ugpass.go.ug)

Requests and complaints received will be responded to within the timelines provided for in the Data Protection and Privacy Regulations (2021).

## **Data Retention**

Personal data provided by subscribers will be retained for a period of ten years as per the applicable regulations.

## **Contacts & Revisions**

The data protection officer for this service can be contacted at [dpo@ugpass.go.ug](mailto:dpo@ugpass.go.ug). A complaint can also be submitted using the address below:

Attention:  
DATA PROTECTION OFFICER  
MANTRA TECHNOLOGIES LIMITED  
SAI AMARA PLAZA, SPRING ROAD, BUGOLOBI  
P.O.BOX 8623 KAMPALA, UGANDA

This Privacy Notice may be updated at any time to reflect changes in this service and will be published here. You should check this website frequently to see any recent changes.

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