# **Privacy Policy**

Effective Date: 16<sup>th</sup>, September, 2025

Version: 1.0

Rockside Consults Ltd ("Rockside", "we", "us", or "our") operates the AiCollect platform. We are committed to protecting the privacy and personal data of cooperatives, businesses, and their members in line with the Data Protection and Privacy Act, 2019 of Uganda.

This Privacy Policy explains how we collect, use, store, and protect personal data when you use AiCollect.

### 1. Information We Collect

- Cooperative/Business Data: registration details, governance documents, tax identification number, bank account details, and authorized signatory information.
- Member Data: names, contact details, gender, age, membership status, acreage, production/yield data, and transaction history.
- System Data: login details, usage activity, device and browser information, and IP addresses.
- Financial Data: subscription payments, transaction records, and deductions made through AiCollect.

#### 2. How We Use information

- Platform Operations: to provide services to cooperatives/businesses and members, enable transactions, and manage subscriptions.
- Compliance: to meet legal obligations under the Cooperative Societies Act, Companies Act, Tax laws, and the Data Protection and Privacy Act, 2019.
- Traceability & Reporting: to generate compliance reports (e.g., EUDR traceability, audits).
- Improvement: to monitor and enhance platform performance user experience and ensuring security of the platform.
- Partner Services: to connect cooperatives/members with input providers, financial institutions, and extension services, subject to consent.

### 3. Legal Basis for Processing

- Consent from cooperatives, businesses, or their members.
- Legal obligation where required by Ugandan law.
- Contractual necessity to provide AiCollect services.
- Legitimate interest to ensure platform integrity, fraud prevention, and system improvement.

# 4. Data Sharing and Disclosure

- Regulators (e.g., Registrar of Cooperatives, URA) where legally required.
- Service Providers (e.g., payment processors, hosting providers) under strict data protection agreements.
- Partners (e.g., financial institutions, input providers, off-takers) only with prior consent of the cooperative or business.

#### 5. Data Storage and Security

- Data is stored securely on encrypted systems and servers.
- Access is restricted to authorized personnel only.
- Technical and organizational measures (encryption, access controls, monitoring) are in place to prevent unauthorized access, loss, or misuse.

#### 6. Data Retention

- Personal data will be retained only as long as necessary for the purposes outlined or as required by law.
- Upon account termination, data will be deleted or anonymized, except where retention is legally required.

# 7. Data Subject Rights

- Access their personal data.
- Request correction of inaccurate or incomplete data.
- Request deletion of their data (subject to legal or contractual obligations).
- Object to processing or withdraw consent.
- Request portability of their data.
- Requests may be sent to: privacy@rocksideconsult.com

### 8. Cross-Border Data Transfers

 Where data is transferred outside Uganda (e.g., cloud hosting providers), we will ensure such transfers comply with the Data Protection and Privacy Act, 2019, and that appropriate safeguards are in place.

#### 9. Children's Data

• AiCollect does not knowingly register individuals under the age of 18 as cooperative members unless permitted by Ugandan cooperative law and with parental/guardian consent.

# 10. Data Breach Notification

• If a data breach occurs that is likely to result in a risk to rights and freedoms, we will notify affected cooperatives and members within 72 hours of becoming aware, in line with the Data Protection and Privacy Act, 2019.

# 11. Updates to This Policy

We may update this Privacy Policy from time to time. Material changes will be communicated to
cooperatives and businesses via email or through the AiCollect platform. Continued use of AiCollect
constitutes acceptance of the updated policy.

# 12. Contact Us

Data Protection Officer

**Rockside Consults Ltd** 

Plot 19 Lumumba Avenue, Kampala, Uganda

2 Email: privacy@rocksideconsult.com

2 Tel: +256 414 672152

#### 13. Confidentiality and Data Protection

Rockside treats all personal and business data processed on AiCollect as confidential. Such data shall not be disclosed to unauthorized parties and will be accessed only by personnel or service providers who require it for legitimate business or compliance purposes and who are bound by confidentiality obligations. Rockside complies with the Uganda Data Protection and Privacy Act, 2019 and applies safeguards aligned with international standards, including GDPR principles and ISO/IEC 27001 information security practices.

#### 14. International Standards

Rockside is committed to upholding international standards of data protection and information security. AiCollect follows globally recognized principles, including lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and accountability, in line with the EU General Data Protection Regulation (GDPR). Where relevant, AiCollect's technical and organizational measures are benchmarked against ISO/IEC 27001 standards.

#### 15. Third- party Links and services.

AiCollect may contain links to third-party websites, applications, or services. Rockside is not responsible for the privacy practices, content, or security of such third parties. Users are encouraged to review the privacy policies of third-party services before providing personal data. Where AiCollect integrates with third-party services (such as payment processors or input suppliers), data will only be shared with such parties where necessary for service delivery and in accordance with this Privacy Policy.