

2024 TWAVEZA PRIVACY NOTICE

1. About the policy

TWAVEZA East Africa (TWAVEZA, We, Us or Ours) is a non-governmental organization committed to its mission and vision. We respect the personal information and data that we collect from you through our website, various application forms and through other methods owned and controlled by us. This Privacy Notice outlines how we collect, use, disclose, and safeguard your personal data when you interact with our organization, whether through our website, programs, or other channels. Throughout this Policy, "You" or "Your" refers to the User whether you are an individual, a guest user, a visitor, or a representative of an entity, who visits, accesses, uses, downloads, interacts with, avails Services, engage in our program or transacts through this Platform or TWAVEZA.

This Policy is a fundamental component of our website terms and conditions. It should be reviewed in conjunction with specific terms and conditions, disclaimers, declarations, and undertakings thereof. By using our services, you consent to the collection and use of your information as described in this policy. We may update this policy periodically, so please review it regularly.

2. What kind of personal information do we collect and process?

We collect and process information which identifies or may reasonably identify an individual with reasonable effort ("Personal Information"). The Personal Information being gathered may include name, email address, job title, address, telephone number, location or any additional information you elect to provide directly to us. In interacting with our website, we may also log technical information such as your Internet Protocol (IP) address, browser type, cookie information, access times and device type.

3. How Do We Collect Personal Information?

We collect personal information in the following ways:

- a) **Directly from You:** We obtain personal information when you provide it to us, particularly during our events, activities, and initiatives—both virtual and in-person. This includes interactions with TWAVEZA staff, contractors, subcontractors, representatives, consultants, and affiliated organizations working on our behalf, as well as when you fill out forms on our website or participate in our activities.
- b) **Indirectly from You:** We also gather information indirectly when you visit our websites. This includes technical data about your device and browsing behavior, such as your IP address and interactions with the site, which may be collected through cookies.
- c) **From Third Parties:** Additionally, we may receive information about you from third parties, such as our affiliated organizations, representatives, government bodies, and researchers.

4. How might we use this information?

- a) In our program activities like research or studies conducted
- b) To contact you with information about campaigns, fundraising and events
- c) To provide services to you were agreed between us and you
- d) To process job applications
- e) Support you as a volunteer

5. How long will we store your information?

We retain your data for as long as we reasonably require it for the purpose it was collected. We will only store your information for as long as is necessary for the purpose it was collected. Once it is no longer necessary to store your information, we will anonymize or delete your information so you will no longer be identifiable. This is subject to any legal or statutory obligations requiring the data to be retained for a longer period.

6. Minors

In conducting our activities, we may collect personal data from minors after obtaining consent from the guardian. TWAWEZA shall treat personal data of minors as sensitive data whereby we shall ensure higher security measures and protection are in place.

7. With whom we share information?

We may share your Personal Information with third parties ("Recipients") as described in this Privacy Policy. The Personal Information will be disclosed to Recipients only to the extent required for the specific purpose, as stipulated in this Privacy Policy. We share Personal Information with any of the following recipients:

- a) Our entities in Tanzania, Kenya and Uganda in accordance with the relevant laws and regulations
- b) Vendors, service providers, event organizers, and consultants that perform services for us such as marketing and market research, promotions management, payment processing, customer service, mail/email delivery, auditing, legal advisors and other services;
- c) Governmental authorities or other entities as strictly required by laws or regulation;
- d) Any other person duly authorized by you to receive the information

Any personal data collected from our project or program will only be disclosed to third parties when it is anonymized so that it no longer reasonably identifies you.

8. Cross border data transfer

The personal data we collect from you may be transferred to and stored in countries outside Tanzania. It may also be processed by companies operating in other countries that work on our behalf or for our service providers. For example, the servers used to host our website may be located in a different country, which is common in our global online environment. To ensure your personal information remains secure during such transfers, we will take all reasonable steps to maintain an appropriate level of protection in accordance with this Privacy Policy.

Any local or cross-border transfer of personal data will be conducted in compliance with the relevant provisions of the Personal Data Protection Act, 2022.

9. Use of Cookies

Our website employs cookies to differentiate you from other users. This enables us to offer you a better browsing experience and helps us enhance our site.(see cookies policies)

10. Third party services

While using the Services you may encounter links to third party websites, services or applications (such as third party social media apps). Please keep in mind that this Privacy Policy does not apply to any third party websites, services or applications, even if they are accessible, downloadable, or otherwise distributed through our Services. Please be advised that such third party websites, services or applications are independent from us. We assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third party websites and/or services. We encourage you to carefully read the privacy policies and the terms of use of such third party websites and/or services, as their terms, not ours, will apply to any of your interactions with such third parties. You should always review their privacy practices carefully before providing Personal Information to such third parties. You are knowingly and voluntarily assuming all risks of using any third-party websites, services or applications. You agree that we shall have no liability whatsoever with respect to such third party sites and your usage of them.

11. Your Rights

You may contact us at any time by email to dpo@twaweza.org and request: -

- a) To access or delete any Personal Information relating to you;
- b) To change or update any Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted).
- c) That we will provide the Personal Information you gave to us.
- d) To withdraw your consent to our processing activities (provided that such processing activities rely on your consent, and not on a different legal basis);
- e) To not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;

Please note that these rights are not absolute and requests are subject to any applicable legal requirements, including KYC requirement, tax or AML regulations and other legal and ethical reporting or document retention obligations. We may also rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion, in accordance with our internal policies.

12. How do we protect your information

TWAVEZA takes great care in implementing and maintaining the security of Users information. Therefore, we have put in place appropriate physical and technological safeguards to help prevent unauthorized access, maintain data security, and ensure the proper use of the information we collect. We employ standard procedures and controls to ensure the safety of our users' information, such as:

- Secure network topology, which includes intrusion prevention and firewall systems
- Encrypted communication
- Authentication and access control
- External and internal audit tests
- We store your information securely and restrict access as appropriate.
- We give training to our staff in how to handle information securely.

13. Changes to the Privacy Policy

We reserve the right to change this Privacy Policy at any time, so please re-visit our website page frequently. We will provide notice of substantial changes of this Privacy Policy by posting the updated terms on our platforms.

14. Acceptance of this policy

Continued use of our sites or platform signifies your acceptance of this policy. When accessing our website, we will further request your acceptance of the privacy policy.

15. How to contact us

If you have any general questions about the information that we collect about you and how we use it, please contact us via email at dpo@twaweza.org or call us at the following numbers:

- Tanzania: +255 22 266 4301, +255 712 333 332

- Uganda: +256 312 112 815

- Kenya: +254 786 563 722, +255 715 563 720