



**VUBA VUBA AFRICA Ltd**

**PERSONAL DATA PROTECTION POLICY**

**Version 1.0**

**Date: October 2023**

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# **1. Introduction**

## **1.1. Objective**

This policy outlines VUBA VUBA AFRICA Ltd's commitment to protecting personal data collected and processed during our business operations, including delivery services.

## **1.2. Scope**

This policy applies to all personal data collected from customers, employees, and any other individuals during our business activities.

# **2. Data Collection and Processing**

## **2.1. Consent**

We obtain explicit consent from individuals before collecting and processing their personal data, and we inform them of the purposes of data collection.

## **2.2. Data Collection**

We collect personal data necessary for our services, including but not limited to name, address, email, and payment information. The lawful basis for data collection is legitimate interests.

## **2.3. Purpose**

Personal data is collected and processed for the purpose of providing good services such as order fulfilment, customer support, marketing, etc.

## **2.4. Data Minimization**

We adhere to the principle of collecting only the data that is strictly necessary for the intended purpose.

## **2.5. Data Accuracy**

We take measures to ensure data accuracy and provide individuals with the means to request corrections.

# **3. Data Security**

## **3.1. Protection Measures**

We implement robust security measures, including encryption, access controls, and regular security audits, to protect personal data.

## **3.2. Data Breach Response**

We have established procedures for detecting, reporting, and responding to data breaches in accordance with relevant data protection regulations.

## **4. Data Retention**

### **4.1. Retention Period**

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, as well as to comply with legal obligations.

### **4.2. Data Disposal**

We securely dispose of data when it is no longer needed.

## **5. Data Subject Rights**

### **A. Access**

Individuals have the right to request access to their personal data held by us.

### **B. Rectification**

Individuals can request corrections to inaccurate data.

### **C. Deletion**

Individuals can request the deletion of their data (the right to be forgotten).

### **D. Portability**

Upon request, we facilitate the transfer of an individual's data to another data controller.

## **6. Employee Responsibilities**

### **A. Training**

Our employees receive training and awareness programs to ensure they understand and comply with data protection policies.

### **B. Confidentiality**

Employees are bound by confidentiality agreements and are responsible for the responsible handling of personal data.

## **7. Data Transfers**

### **A. International Transfers**

We manage international data transfers in compliance with applicable data protection regulations.

## **8. Compliance**

### **A. Regulatory Compliance**

VUBA VUBA AFRICA Ltd is committed to complying with all applicable data protection laws and regulations, including Law No 058/2021 of 13/10/2021 relating to the protection of personal data and privacy.

## **9. Review and Updates**

### **A. Policy Review**

This policy is reviewed and updated regularly to ensure compliance with legal requirements and industry best practices.

## **10. Contact Information**

### **A. Data Protection Officer (DPO):**

For data protection inquiries, please contact our Data Protection Officer at:

Email: [lucie@esicia.rw](mailto:lucie@esicia.rw)

Tel: +250788387707

### **B. Customer Support:**

For customer data-related inquiries, please contact our customer support team at:

Email: [info@vubavuba.rw](mailto:info@vubavuba.rw)

Tel: +250788301607

## **11. Legal Disclaimer**

This policy outlines our commitment to data protection but is subject to legal and regulatory limitations.

## **12. Enforcement**

Violations of this policy may result in appropriate actions, including but not limited to legal actions and termination of employment.