



DATA PROTECTION AND PRIVACY POLICY

Objective:

The purpose of this policy is to ensure that Billbrain Technologies adheres to the highest standards of data protection and privacy, safeguarding personal and sensitive data. This policy outlines how the company collects, processes, stores, and protects data in compliance with relevant laws and regulations, including the **General Data Protection Regulation (GDPR)** and other applicable data protection laws.

Policy Statement:

At Billbrain Technologies, we recognize the importance of protecting the privacy and confidentiality of personal and sensitive data entrusted to us by our clients, employees, and partners. We are committed to ensuring that all personal data is processed in a lawful, fair, and transparent manner and that it is handled with the utmost care to prevent unauthorized access, disclosure, or misuse.

We are dedicated to:

- Ensuring that all personal data is processed **lawfully, fairly, and transparently**.
- Collecting personal data only for **legitimate purposes** and using it solely for the purposes for which it was collected.
- Implementing strict **security measures** to protect personal data against accidental or unlawful destruction, loss, alteration, or unauthorized disclosure.
- Complying with all relevant data protection laws and regulations, including the **GDPR** and local data protection laws.
- Educating and training employees on the importance of data protection and privacy.

Scope of Application:

This policy applies to all **employees, contractors, third-party service providers**, and partners who have access to personal data and are involved in its collection, processing, storage, or transfer. It applies to all types of data, including but not limited to employee data, client data, and partner data.

Data Protection Principles:

Billbrain Technologies is committed to adhering to the following **data protection principles**:

1. **Lawfulness, Fairness, and Transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Personal data will be collected only for specific, legitimate purposes and will not be used in ways incompatible with those purposes.
3. **Data Minimization:** Only personal data that is necessary for the specific purpose will be collected and processed.

4. **Accuracy:** We will ensure that all personal data is accurate, complete, and kept up to date.
5. **Storage Limitation:** Personal data will be kept in a form that allows identification of data subjects for no longer than necessary.
6. **Integrity and Confidentiality:** We will ensure that personal data is processed in a secure manner, preventing unauthorized access or disclosure.
7. **Accountability:** Billbrain Technologies will be accountable for complying with data protection principles and ensuring that appropriate safeguards are in place.

Data Collection and Processing:

1. **Collection:**
 - Personal data will be collected only for specific, legitimate purposes, such as providing services, maintaining business operations, or complying with legal obligations.
 - We will obtain **explicit consent** from individuals when necessary, and clearly inform them about the data we are collecting and the purpose for which it will be used.
2. **Processing:**
 - Personal data will be processed in accordance with this policy and only for the purposes for which it was collected.
 - We will implement **appropriate measures** to ensure data is accurate, complete, and relevant for the intended purpose.
3. **Storage:**
 - Personal data will be stored securely in encrypted databases or storage systems and will only be accessible by authorized personnel.
 - We will retain personal data for no longer than necessary for the purposes for which it was collected. When personal data is no longer needed, it will be securely deleted or anonymized.

Data Security Measures:

Billbrain Technologies will take appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, or destruction. These measures include:

1. **Access Controls:** Only authorized personnel will have access to personal data. Access will be granted based on job responsibilities.
2. **Encryption:** Sensitive data will be encrypted both in transit and at rest to prevent unauthorized access.
3. **Data Backup:** Regular backups of personal data will be performed to ensure that data is not lost in the event of a disaster or data breach.
4. **Network Security:** Strong firewalls, intrusion detection systems, and secure connections will be maintained to protect against cyber threats.
5. **Employee Training:** All employees will be trained on data protection principles and secure handling of personal data.

Data Subject Rights:

Billbrain Technologies respects the rights of data subjects and will ensure that individuals can exercise their rights as outlined under relevant data protection laws. These rights include:

1. **Right to Access:** Individuals have the right to access the personal data we hold about them.
2. **Right to Rectification:** Individuals have the right to request corrections to any inaccurate or incomplete personal data.

3. **Right to Erasure:** Individuals have the right to request the deletion of their personal data, subject to certain conditions.
4. **Right to Restriction of Processing:** Individuals may request that their personal data be restricted from processing under certain circumstances.
5. **Right to Data Portability:** Individuals have the right to request that their personal data be transferred to another service provider.
6. **Right to Object:** Individuals can object to the processing of their personal data for certain purposes, including direct marketing.

Data Transfers:

Billbrain Technologies will not transfer personal data to third parties outside of the organization except where it is necessary to do so for business purposes. When transferring personal data to third parties or international jurisdictions, we will ensure that appropriate safeguards are in place to protect the data, in compliance with applicable data protection laws.

Responsibilities:

1. **Top Management:**
 - Ensure that adequate resources and systems are in place to support data protection and privacy.
 - Review and approve this policy and ensure its implementation across the organization.
2. **Data Protection Officer (DPO):**
 - Oversee and manage data protection and privacy compliance within Billbrain Technologies.
 - Act as the point of contact for all data protection-related inquiries and concerns.
3. **Employees and Contractors:**
 - Comply with the company's data protection and privacy policies and procedures.
 - Report any data protection concerns or incidents to the DPO immediately.

Monitoring and Evaluation:

- Billbrain Technologies will regularly audit its data protection practices to ensure compliance with applicable laws and regulations.
- We will maintain an **incident response plan** for addressing potential data breaches and ensuring compliance with notification requirements.

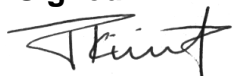
Review and Continuous Improvement:

This policy will be reviewed annually and updated as necessary to ensure compliance with changes in data protection laws, regulations, and industry best practices.

Approval and Implementation:

This Data Protection and Privacy Policy is approved by **Top Management** and is applicable across all departments within Billbrain Technologies. The policy will be communicated to all employees, contractors, and third parties who have access to personal data.

Signed:



James Isagara Kisoro

Position: Managing Director

Date: 01.01.2023