



Telecare Privacy Policy

**We care for you.
We offer you a safe
space to talk.**



TELE CARE
BECAUSE WE CARE



Telecare Privacy Policy (1)

PART 1 – Privacy Policy Introduction

AYINET and Telecare are committed to achieving and maintaining industry leading standards in relation to the privacy of personal data. In order to maintain AYINET and Telecare’s transparency about how it collects and uses any personal data which, in turn, ensures its data protection obligations are met.

This notice provides all of the relevant information that is needed to understand AYINET and Telecare’s approach to data and privacy protection. This includes who AYINET and Telecare are, what personal data are collected, how and why they are collected, how they are kept secure and for how long they are held. In addition it sets out the rights of the data subject relating to the data held by AYINET and Telecare.

PART 2 – AYINET and Telecare Privacy Notice

Who are AYINET and Telecare and how can you contact us?

TeleCare is operated by AYINET, the ‘African Youth Initiative Network’ based in Lira, Uganda. AYINET, founded in 2005, is an independent, national not-for-profit organization, registered with the national board of the Non-Governmental Organization in Uganda at the Ministry of Internal Affairs, and the Lira District Local Government. AYINET is committed to making peace and justice a reality for victims and survivors of war.

Our contact details can be found on our website, www.ayinet.org and www.telecare-ug.org or you can contact our data protection officer at a.omara@ayinet.org. AYINET is the data controller of any personal data that is provided to AYINET and Telecare through its website. AYINET and Telecare determine the way that that data are processed in line with the requirements of the relevant data privacy legislation and regulations.



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Telecare Privacy Policy (2)

What personal data do AYINET and Telecare collect and process about you?

AYINET and Telecare collect and process certain information from you when you use the AYINET and Telecare website. There may be more information or personal data collected from you if you enquire about the services we offer or interact with the website functionality further. Should you take on any of the commercial services offered by AYINET and Telecare further information will be collected which will form the basis of the commercial relationship.

When you use the AYINET and Telecare website certain information is collected automatically which includes cookies. This can show AYINET and Telecare how you are using the website, which pages and features you have accessed and your location country but no more detail than that. This only applies to website users who have specifically provided their contact information to AYINET and Telecare. If you are a 'casual browser' cookie data is aggregated to show overall web traffic but does not relate to or distinguish the individual.

How do AYINET and Telecare collect personal data from you?

AYINET and Telecare collect the information either directly from the data subject (you) where you are using the website, where there is a direct contact through email or phone or where there is a commercial contract. This may include where there is a third-party acting on behalf of the data subject (you).



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Telecare Privacy Policy (3)

Why do AYINET and Telecare collect and process personal data from you?

AYINET and Telecare may collect data based on consent from the data subject. Where this applies AYINET and Telecare will ensure that any consent was obtained before processing the data and that consent is documented. AYINET and Telecare may also collect your data (or be provided it) on the basis of a contractual relationship between AYINET and Telecare and the data subject or a third-party acting on behalf of the data subject. Where there is no contract with AYINET and Telecare your data will be processed on the basis of a legitimate interest.

How do AYINET and Telecare keep your personal data secure?

The security of your personal data is covered in a number of elements to ensure that the appropriate 'technical and organisational measures' are in place. As part of this a full suite of policies are maintained within our Information Security Management System. In addition to the policies AYINET and Telecare apply other measures and controls to ensure that personal data are secure. These include (but are not limited to) staff training, a cloud based LRM and CRM system, internal working groups, continuous monitoring and improvement, relevant background checks (where needed), physical security measures at AYINET and Telecare office locations, data segregation within our systems and network access controls.



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Telecare Privacy Policy (4)

How long do AYINET and Telecare keep your personal data for?

AYINET and Telecare will only keep your data for as long as it is required.

Your rights in relation to your personal data

Under the Ugandan Data Protection Law and the GDPR everyone has the following rights, please note however that not all of these are an absolute right and may depend on certain factors such as the basis and purpose for processing the data.

- *The right to be informed*
- *The right of access*
- *The right to rectification*
- *The right to erasure (this is also referred to as the right to be forgotten)*
- *The right to restrict processing*
- *The right to data portability*
- *The right to object*
- *The right not to be subject to automated decision-making*

In order to fulfil any request in line with the above rights it may be necessary for AYINET and Telecare to request further information in order to verify the identity of the requestor.

If you have any concerns about our use of your personal information, you can make a complaint to us at info@ayinet.org and info@telecare-ug.org.



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African Youth Initiative Network
Plot 11, Onapa Road,
Barogole Wigweng Quarters, Lira City West
P.O. Box 981, Lira – Uganda



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