



Ubunifu Akili Solutions

Privacy Policy

Compliant with POPIA and PAIA

Effective Date: 26 June 2025

1. Introduction

Ubunifu Akili Solutions is committed to protecting the privacy and security of personal information in compliance with the Protection of Personal Information Act (POPIA), 2013 and the Promotion of Access to Information Act (PAIA), 2000 of South Africa. This policy outlines how we collect, process, store, protect, and grant access to personal information, ensuring lawful, fair, and transparent data practices across our operations.

2. Purpose

The purpose of this policy is to:

- Establish rules and procedures to ensure compliance with POPIA and PAIA.
- Safeguard personal information against misuse, loss, unauthorised access, and unethical practices.
- Inform data subjects about their rights and how their information is used.

3. Scope

This policy applies to:

- All employees, contractors, and partners of Ubunifu Akili Solutions.
- All data subjects whose personal information we collect, including clients, research participants, service providers, and third parties.

4. Definitions

- Personal Information: Any information relating to an identifiable natural or juristic person.
- Data Subject: The person to whom the personal information relates.
- Responsible Party: Ubunifu Akili Solutions, who determines the purpose and means of processing personal information.
- Processing: Any operation or activity concerning personal information, including collection, storage, modification, dissemination, or destruction.
- Operator: A third party who processes information on behalf of the responsible party.

5. Legal Framework

Ubunifu Akili Solutions aligns with the following legal instruments:

- POPIA – ensuring responsible collection, use, and protection of personal data.
- PAIA – providing data subjects the right to access information held by Ubunifu.
- Other relevant legislation – including the Constitution of South Africa, the Electronic Communications and Transactions Act (ECTA), and sector-specific regulations.

6. Information We Collect

Ubunifu collects the following categories of personal information:

- Identification data (e.g., names, ID numbers)
- Contact details (e.g., phone numbers, emails, addresses)
- Demographic data (e.g., age, gender, language)
- Professional data (e.g., job titles, affiliations)
- Research-related data (e.g., survey responses, opinions)
- Financial information (for payments or donations, as applicable)

7. Purpose of Collection

Personal information is collected for the following purposes:

- Conducting research, surveys, and monitoring & evaluation activities
- Contracting, hiring, and project management
- Compliance with legal and regulatory obligations
- Communication with clients, donors, and stakeholders
- Administrative, financial, and human resource functions

8. Consent and Lawful Processing

Ubunifu processes personal data only:

- With informed, explicit, and voluntary consent from the data subject
- If required by law
- If necessary for the performance of a contract
- For legitimate interests, provided it does not override fundamental rights

9. Data Storage and Retention

Personal information is securely stored in encrypted digital formats and/or locked physical files. Access is restricted to authorised personnel only. Retention periods follow legal and project-specific timelines, after which information is safely destroyed or anonymised. Cloud storage (if used) must comply with data residency requirements and undergo due diligence.

10. Safeguarding Measures

Ubunifu employs the following safeguards:

- Technical Controls: Firewalls, encryption, secure servers, two-factor authentication
- Administrative Controls: Role-based access, confidentiality agreements, training
- Physical Controls: Locked cabinets, restricted access areas, CCTV surveillance (where applicable)
- Regular data protection audits and risk assessments are conducted.

11. Data Subject Rights

Data subjects have the following rights under POPIA:

- To be informed of the collection and purpose of their data

- To access their personal information
- To request correction or deletion of inaccurate or outdated information
- To object to processing or direct marketing
- To lodge a complaint with the Information Regulator of South Africa

Ubunifu commits to responding to data access requests within the legally stipulated timeframe of 30 days.

12. Access to Information (PAIA)

In compliance with PAIA, Ubunifu maintains a PAIA Manual detailing:

- The types of records available
- The procedure to request access
- Contact details of the Information Officer

This manual is available on request or accessible via our website.

13. Ethical Use of Data

Ubunifu upholds high ethical standards in all data activities:

- Participation in data collection is voluntary, with clear explanation of risks and benefits
- Data is only used for the purposes communicated during collection
- No data is sold or misused for profit or political purposes
- Anonymisation is applied where necessary to protect identities

14. Third-Party Disclosure

Ubunifu does not share personal data with third parties unless:

- Required by law or court order
- Mandated by contractual obligations (with proper safeguards)
- Explicit consent is obtained from the data subject
- The third party is a compliant operator under a signed data processing agreement

15. Information Officer

The designated Information Officer oversees data protection and access to information compliance.

Name: Dr. Unity Chipfupa

Email: chipfu@ubas-grp.com

Phone: +27 61 346 9535

Address: 5 Evelyn Street, Horizonview 1724, Roodepoort, Gauteng

16. Breach Notification

In the event of a data breach, Ubunifu will:

- Notify the Information Regulator and affected data subjects without undue delay
- Provide details of the breach, data affected, and remedial actions taken

17. Policy Review and Updates

This policy will be reviewed annually or in response to legislative changes, operational shifts, or data incidents.

18. Contact and Complaints

For any queries, data access requests, or complaints, please contact the Information Officer or the Information Regulator of South Africa:

Website: <https://www.inforegulator.org.za>