

# **Privacy Policy for Personnel**

TerraMagica Brands Uganda

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## 1. Introduction

This Privacy Policy (this “Policy”) describes how and why TerraMagica Brands Uganda Limited (“we”, “us”, or “our”), a company incorporated in Uganda, accesses, collects, stores, uses, shares, and protects your Personal Data in the context of your application, recruitment, employment, training, volunteer period, or contractual relationship with us. This Policy applies to all prospective, current, and former personnel (collectively, “Personnel”), including employees, trainees, volunteers, temporary staff, contractors, and consultants.

Please read this Policy carefully to understand our policies and practices regarding your information. By accepting an offer of employment or training, continuing to work with us, or engaging with our systems and processes as a contractor, volunteer, or applicant, you agree to this Policy.

## 2. General Policy

This Policy relates to “Personal Data”, which we define as information about you from which you can be identified. Personal Data may be recorded in any form. Personal Data does not include aggregated or anonymized information from which it is not possible to identify you.

We respect your privacy, and we are committed to protecting your Personal Data. In the sections that follow, we cover several topics related to Personal Data, including the type of data we collect from you, our use of this data, and your privacy rights.

## 3. What data do we collect about you?

In the course of the application and recruitment process, as well as employment, training, volunteer, and contractual periods, we collect information about our Personnel. The type of Personal Data that we collect depends on the nature of our relationship with you and the legal requirements of your role. As a general rule, we seek to only collect the minimally necessary Personal Data that is needed for our activities. The following table shows the Personal Data that we may collect from you.

#	Category of Personal Data	Examples
1	<i>Personal and Professional Identifiers and Contact Information</i>	Full name, date of birth, postal address, physical address, phone number, email address, marital status, household and family information, nationality, national ID number, passport number, visa/work permit details, tax identification number, social security number, driver’s license number, employee ID number, username, and other unique online identifiers related to work systems.

2	<i>Employment and Background Data</i>	Information from your curriculum vitae or resume, application information, employment history, education, professional qualifications, references, results of background checks, and professional and social media profiles.
3	<i>Financial and Payroll Information</i>	Bank account information, tax declarations, salary, deductions, benefits selections, pension contributions, and bonus/commission data.
4	<i>Performance and Conduct Data</i>	Performance reviews, disciplinary records, training history, work-related achievements, productivity metrics, and internal communications on company systems (e.g., emails, chats).
5	<i>Health and Safety Information</i>	Medical information for sick leave, health insurance details, records of workplace accidents or injuries, and health data for compliance with public health mandates.
6	<i>Sensory and Workplace Monitoring Data</i>	Video recordings from closed-circuit television (CCTV) cameras, audio recordings from call centers, access logs for buildings or systems, GPS data from company vehicles, photographs of individuals at events or for administrative purposes, videos for promotional purposes.
7	<i>Internet or Similar Network Activity</i>	Internet protocol (IP) addresses, user log files, browsing history, search history, viewing or other activity.
8	<i>Family and Emergency Contact Information</i>	Names and contact information of dependents or emergency contacts.

#### **4. What legal bases do we rely on to collect your information?**

We only collect your Personal Data when we believe it is necessary, and when we have valid legal grounds to do so under applicable law. We may rely on all of the following legal bases to collect or use your Personal Data. Amongst these grounds, our primary legal bases for collecting or using your data are to fulfill our contractual and legal obligations.

- *Performance of a Contract.* We may collect or use your Personal Data to fulfill our contractual obligations with you, which include your employment or engagement

contract. Some of our obligations include processing data for payroll, benefits, and performance management.

- *Legal Obligations.* We may collect or use your Personal Data to comply with our legal obligations, such as social security contributions, tax reporting, or health and safety regulations.
- *Legitimate Interests.* We may collect or use your Personal Data to achieve our legitimate business interests, provided that those interests do not outweigh your interests and fundamental rights and freedoms. Examples include ensuring the security of our premises and systems, preventing fraud, conducting internal business analysis to improve our operations, and carrying out procedures, at your request, before entering into a contract with you.
- *Vital Interests.* We may collect or use your Personal Data where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.
- *Consent.* In some specific and limited cases, we may request your consent to collect or use certain Personal Data, particularly for activities that are not essential to your relationship with us. You have the right to withdraw your consent at any time.

## **5. Is it mandatory for you to share your data with us?**

Sharing certain Personal Data is necessary for us to fulfill our contractual and legal obligations to you, and for you to be employed or engaged by us. Without this data, we cannot fulfill our duties as an employer or complete essential processes such as a pre-employment or recruitment background check or processing your salary. You have the right to decline or withdraw consent for data processing that is not essential to our relationship with you.

## **6. What are the consequences if you do not share your data with us?**

Refusing to share data that is essential for your employment or engagement will prevent us from providing that opportunity to you. For example, if you do not provide us with your bank account details, we cannot process your salary. If you refuse to provide information required for a company-mandated background check during the application process, we cannot proceed with your candidacy. The consequences of not sharing data are limited to the inability to receive the specific opportunities that require such information.

## **7. How do we collect your data?**

You directly provide us with most of the data that we collect. However, we also collect your data automatically through our systems or from third parties. The following table identifies the most common sources of Personal Data.

#	Data Sources	Primary Methods of Collection
1	<i>Directly from you</i>	<ul style="list-style-type: none"> <li>• When you apply for a position or complete an onboarding form.</li> <li>• When you submit expense reports, update your contact information, or provide feedback.</li> </ul>
2	<i>Automatically</i>	<ul style="list-style-type: none"> <li>• When you use our internal systems, networks, and applications, which may generate records such as access logs for our facilities, metadata from internal email and chat systems, and usage data from company-issued devices.</li> </ul>
3	<i>From third parties</i>	<ul style="list-style-type: none"> <li>• Background check providers.</li> <li>• Former employers and references.</li> <li>• Educational institutions for verifying your qualifications.</li> <li>• Government bodies or officials.</li> <li>• Family members.</li> <li>• Benefits providers.</li> <li>• Professional licensing bodies.</li> </ul>

## 8. How will we use your data?

We use your Personal Data for the following purposes:

- *Recruitment and Onboarding:* To process job applications, verify information, conduct background checks and screenings, manage the hiring process, and facilitate the onboarding of new hires.
- *Contractual Administration:* To manage employment contracts and contracts for other work relationships, process payroll, administer benefits, and manage expense claims.
- *Compliance and Legal Obligations:* To fulfill our statutory duties, such as remitting tax deductions, processing social security contributions, and complying with other legal and regulatory obligations in all relevant jurisdictions.
- *Business Operations and Improvement:* To manage work assignments, facilitate internal communications, provide training, carry out performance reviews, and conduct internal auditing, statistical analysis, and workforce planning.
- *Security and Fraud Prevention:* To protect our business, customers, and Personnel from fraudulent activities, and to ensure the security of our physical premises and data systems.
- *Other Activities:* To carry out other activities that we notify you about through our communications.

## 9. When and with whom do we share your data?

The following table shows in what circumstances and with whom we may share your Personal Data. In general, we may disclose your Personal Data to anyone to whom disclosure is necessary to fulfill the purpose for which you provided the Personal Data, as well as to comply with our legal obligations. Please note that such disclosure is not considered to be “selling,” as we do not sell or share your Personal Data to third parties for monetary or other valuable consideration.

#	Type of Third Party	Primary Purposes for Disclosure	Protections
1	<i>Regulatory authorities and law enforcement agencies</i>	<ul style="list-style-type: none"> <li>To comply with our legal and regulatory obligations, including tax collection, social security contributions, and immigration compliance.</li> <li>To cooperate with any investigations, as necessary, or to respond to inquiries in relation to our compliance with applicable law or regulations.</li> <li>Where we, in good faith, believe disclosure is appropriate to prevent or investigate a possible crime, or to protect the security of our personnel or property or the personnel or property of others.</li> </ul>	We endeavor to limit such disclosures to the minimum necessary and to obtain assurances that your Personal Data will be protected.
2	<i>Judicial authorities and parties to judicial proceedings</i>	<ul style="list-style-type: none"> <li>To respond to a court order or other binding request.</li> </ul>	
3	<i>Payroll and benefits providers</i>	<ul style="list-style-type: none"> <li>To process payroll, administer retirement plans and health insurance, and provide other employee benefits.</li> </ul>	We execute contracts with service providers prohibiting them from using or sharing your Personal Data except as necessary to perform the contracted services on our
4	<i>Information technology and data</i>	<ul style="list-style-type: none"> <li>To maintain employee records, manage internal</li> </ul>	

	<i>hosting service providers</i>	communication systems, and host human resources applications.	behalf or to comply with applicable legal requirements.
5	<i>Background check providers</i>	<ul style="list-style-type: none"> <li>To verify information you have provided in your application and onboarding materials.</li> </ul>	
6	<i>Professional advisors</i>	<ul style="list-style-type: none"> <li>To seek legal counsel on employment law, resolve disputes, or conduct audits.</li> </ul>	
7	<i>Successor-in-interest (actual or proposed)</i>	<ul style="list-style-type: none"> <li>To continue to perform the functions and activities described above in relation to the purposes for which we collect your Personal Data in the event of a proposed or actual purchase, any reorganization, sale, lease, merger, joint venture, assignment, amalgamation, or any other type of acquisition, disposal, or financing of all or any portion of our business or of any of the business assets or shares (including in connection with any bankruptcy or similar proceeding).</li> </ul>	We will endeavor to direct the transferee to use Personal Data in a manner that is consistent with this Policy.
8	<i>General public</i>	<ul style="list-style-type: none"> <li>To showcase TMB in promotional or business materials, in either digital and physical form, that we may share with the general public or with certain customers, suppliers, distributors, investors, partners, or other business associates.</li> </ul>	We strictly limit such disclosures to information for which personnel have given express consent to publish. In general, such disclosures may include an employee's name, photograph, professional background information, and personal TMB contact information. At any time and

			without consequences, Personnel may withdraw consent to prevent potential excess exposure of such Personal Data.
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## 10. How do we store your data?

We store your Personal Data in accordance with reasonable security measures to prevent unlawful or unauthorized processing and accidental loss, destruction, alteration, or damage. These measures include both physical and digital safeguards. Physical security includes storing hard copies of records in locked cabinets. Digital security measures include data encryption, secure networks, strong access controls, password protection for electronic copies of data, and a commitment to ongoing security assessments. Access to Personal Data is limited to only those employees who have a legitimate business need to access it within the scope of their duties. We also require our third-party data processors to adhere to similar stringent security standards.

## 11. Where do we store your data?

While we may store your Personal Data in your country, we may also have it transferred to, processed, or viewed in another country, where allowed by applicable laws. We may transfer your Personal Data to a recipient in another jurisdiction or receive your Personal Data from a provider in another jurisdiction. If we do so, we will ensure that at least one of the following protections applies:

- The recipient is located in a jurisdiction in which the laws ensure a level of data protection that is equivalent to those in the jurisdiction where the data was collected.
- The recipient is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments that provide appropriate safeguards for your Personal Data.
- We have established appropriate contractual safeguards to protect your Personal Data.
- You explicitly consent to the transfer.

## 12. How long do we keep your data?

In general, we will retain your Personal Data for as long as necessary to achieve the purposes outlined in this Policy. This timeframe includes the duration of your application and recruitment process, employment, training, volunteer, or contractual relationship with us, plus a defined period afterward to comply with legal recordkeeping requirements. We may retain your Personal Data for a longer period if doing so is required under applicable law, or if a longer period is needed to resolve disputes or protect our legal rights or otherwise comply with legal obligations.

When we have no ongoing legitimate business need to use your Personal Data, we will either delete or anonymize such information, or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further use until deletion is possible.

### **13. What are your legal rights in relation to your data?**

You are entitled to the following:

- *Right to Object/Opt-Out.* You have the right to object to the collection, storage, or use of your Personal Data, particularly for purposes that are not essential to the personnel relationship.
- *Right to Withdraw Consent.* If we are relying on your consent (which may be express and/or implied consent depending on the applicable law) to collect, store, use, or share your Personal Data, you have the right to withdraw your consent at any time. If you withdraw your consent, we may not be able to perform certain processes for you, but we will always honor your request.
- *Right to Know.* You have the right to request a disclosure of the categories and specific pieces of Personal Data we have collected about you, the sources of that information, and the purposes for which it is used.
- *Right to Access.* You have the right to request confirmation of whether we hold or are processing your Personal Data and to receive a copy of that data.
- *Right to Rectification/Correction.* You have the right to request that we correct any information that you believe is inaccurate or incomplete, either before or after the point of data collection.
- *Right to Erasure/Deletion.* You have the right to request deletion of your Personal Data, under certain conditions. This right is subject to our legal obligations to retain records for specific periods.
- *Right to Limit Use.* You have the right to direct us to limit the use and disclosure of your sensitive Personal Data to only what is necessary for our business practices.

If you would like to exercise any of these rights, please contact us using the contact information provided below.

### **14. Changes to this Policy**

We will update this Policy as necessary to stay compliant with relevant laws or in accordance with changes that we may make to our business practices. Accordingly, we reserve the right to update or modify this Policy at any time, without prior notice (unless prohibited in your jurisdiction), by posting the revised version of this Policy on our internal communication channels or systems. Your continued employment or engagement with us after we have posted the revised Policy constitutes your agreement to be bound by the revised Policy.

## **15. Contact Information**

If you have any questions about this Policy or our data protection and privacy practices, please contact us by mail, email, or telephone:

*Address:*

TerraMagica Brands Uganda  
P.O. Box 183471 Kampala GPO  
Mutungo Hill, Nakawa Division  
Kampala, Uganda

*Email:* [support@terramagica.co](mailto:support@terramagica.co)

*Telephone:* +256-784-849-236

## **16. Dispute Resolution**

If you believe that we have not complied with this Policy or applicable data protection laws, you may lodge a complaint with the relevant regulatory authority in your jurisdiction.