

PRIVACY NOTICE

Date: 10th November 2025

This Privacy Notice explains how **Centenary Technology Services Limited (Cente-Tech)** ("we," "us," or "our") collects, uses, shares, and protects information in connection with your use of the **Cente School** mobile application (the "App").

1. Data Controller and Contact Details

The entity responsible for the processing of your personal data (the Data Controller) is **Cente-Tech**, located in Kampala, Uganda. For all privacy inquiries, including exercising your rights, please contact us directly via email at dpo@centenarygroup.co.ug

2. Information We Collect

We collect information necessary for the operation of the App.

- **Personal Identifiers and Account Data:** Because the App requires registration, we collect your email address, usernames, and hashed passwords for Contractual Necessity.
- **Social Login Data:** If you use a third-party social media account to log in, we receive profile information (like your name and email) to create and secure your user profile and for Contractual Necessity.
- **Device, Usage, and Identifiers:** We automatically collect Device type, OS version, IP address, and unique device identifiers. This processing is based on our Legitimate Interest to ensure the security and stability of the App and analyze usage for service improvement.
- **Media and Content Data:** We process data such as profile pictures and data obtained through QR code scans. This processing is based on your explicit Consent, which is necessary to personalize your profile and enable core functions.

3. How Do We Keep Your Information Safe?

CENTE-TECH is committed to protecting your personal data. We have implemented technical and organizational security measures designed to protect the security of any personal information we process. Specific measures we employ include Encryption, Access Control, Anonymization/Pseudonymization and Password Hashing.

In the event of a personal data breach, CENTE-TECH will immediately notify the Personal Data Protection Office (PDPO) in compliance with the Act. Direct notification to you, the data subject, will follow the instruction and guidance of the PDPO.

4. When and with Whom Do We Share Your Personal Data

We only share your personal data when strictly necessary, transparently and only with third parties who can offer adequate data protection.

- **Processors and Service Providers:** We share personal data with external vendors ("Processors") who perform services for us and are contractually bound to process data only according to our instructions.
- **Analytics and Advertising Partners:** We share usage and identifier non-personal data with third parties for analytics.
- **Legal Obligation and Safety:** We may disclose your information where we are legally required to comply with applicable law, governmental requests, or legal processes.

5. International Data Transfers

We ensure your data remains protected by implementing appropriate safeguards required by the Data Protection and Privacy Act.

6. Data Retention and Children's Privacy

- **How Long We Keep Your Information Safe:** We retain your personal data only for as long as your user account is active or as needed to provide services. Following termination, most data is securely deleted or anonymized within 90 days. We retain limited data necessary to comply with our legal obligations (e.g., tax, accounting, and Anti-Money Laundering requirements). During this statutory retention period, we will not process or share your retained data for any purpose other than fulfilling the mandatory regulatory compliance obligation.
- **Children's Privacy:** The App is not targeted at, nor intended to be used by, children under the age of 16.

7. Your Data Protection Rights (Uganda DPPA, 2019)

Under the Data Protection and Privacy Act, 2019 (Uganda), you have the following definitive rights concerning your personal data. You may exercise any of these rights by contacting us at dpo@centenarygroup.co.ug and following the required procedures (e.g., submitting the prescribed forms):

- **Right to Access Personal Data:** You have the right to obtain confirmation as to whether your personal data is being processed and access the data and information on the processing purposes and recipients. To exercise this, you should submit a formal request using the prescribed Form 8.
- **Right to Rectification, Blocking, Erasure, and Destruction:** You have the right to rectification of inaccurate personal data. We ensure that inaccurate or incomplete data is erased, amended, or rectified upon your request.
- **Rights in Relation to Automated Decision-Taking:** You have the right not to be subject to a decision that is based solely on automated decision-taking if that decision significantly affects you.
- **Right to be Informed:** This Privacy Notice fulfills your right to be informed of our identity, processing purposes, legal basis, and data recipients.
- **Right to File a Complaint:** If you have concerns about our handling of your personal data in violation of the Act, you have the right to file a complaint with the Personal Data Protection Office (PDPO) using Form 11 of the Regulations or seek legal recourse in a court of law.

8. Changes to this Privacy Notice

We reserve the right to modify this notice. We will notify you of material changes through the App or via email and update the "Last Updated" date.

9. How Can You Contact Us

If you have any questions or concerns about this Privacy Notice or our data handling practices, please contact the Data Controller directly:

- Data Controller Name: Centenary Technology Services Limited
- Email Address: dpo@centenarygroup.co.ug