DATA PROTECTION & PRIVACY POLICY

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1. PURPOSE & SCOPE

KyatFlow Technologies Limited ("KyatFlow," "we," "us") is committed to protecting the privacy and security of personal data collected through our conversational commerce platform. This policy outlines our standards for data processing in accordance with the **Uganda Data Protection and Privacy Act (2019)** and international best practices (GDPR).

This policy applies to all personal data processed by KyatFlow, including data from clients, partners, and end-users interacting with our WhatsApp-based engines.

2. DATA PROCESSING PRINCIPLES

We adhere to the following core principles:

- **Lawfulness & Transparency:** Data is processed only with explicit user consent or for the performance of a contract.
- **Purpose Limitation:** Data is collected for specific, legitimate business purposes (e.g., e-commerce transactions, booking confirmations) and not processed further in an incompatible manner.
- **Data Minimization:** We only collect the "Minimum Viable Data" required to complete a transaction or service.
- **Accuracy:** We take reasonable steps to ensure personal data is kept up to date.
- **Storage Limitation:** Data is retained only as long as necessary for the purpose it was collected or as required by financial regulations (e.g., AML laws).

3. CATEGORIES OF DATA COLLECTED

Through our Conversational OS, we may process:

- **Identity Data:** Name, Phone Number/MSISDN (WhatsApp ID).
- **Transaction Data:** Payment status, order history, and billing metadata.
- **Location Data:** Geo-tags provided by users for delivery or logistics purposes.
- **Technical Data:** Interaction logs with the WhatsApp API.

4. DATA SUBJECT RIGHTS

Under the Data Protection and Privacy Act (2019), users have the right to:

1. **Access:** Request a copy of the personal data we hold.
2. **Rectification:** Request correction of inaccurate data.
3. **Erasure:** Request the deletion of data ("Right to be Forgotten"), subject to legal retention requirements.
4. **Objection:** Withdraw consent for marketing communications at any time via an "Unsubscribe" command in the chat.

5. DATA SHARING & THIRD PARTIES

KyatFlow does not sell personal data. Data is shared with third parties only to facilitate services:

- **Payment Aggregators:** For processing financial transactions.
- **Infrastructure Providers (Google Cloud):** For secure data hosting.
- **Meta (WhatsApp Business API):** As the communication channel provider.

6. POLICY GOVERNANCE

This policy is reviewed annually. Non-compliance by employees may result in disciplinary action.

CONTACT

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