



Data Privacy Policy

Onward Resources International Ltd respects your data privacy and is committed to protecting and safeguarding your personal data. This is an important notice regarding your privacy and the way in which Onward Resources International Ltd and its affiliates (referred to as “ORI”, “we”, “our” or “us” in this policy) collects, uses and protects your personal data. We know that transparency and trust are essential. It’s also important to us that you enjoy using our website in a safe and secure way. This policy explains how we collect and use different types of personal and behavioral information when you visit our website (regardless of where you visit it from) and the reasons for doing so. We encourage you to contact us if you have any questions about this policy or the ways in which we use your personal data.

We use the information we collect about you to help us understand more about how our website is used and to be able to send you communications about ORI that may be of interest to you, either electronically or otherwise. The ‘personally identifiable information’ is information that enables us to identify you, such as your email address, name, title, and address. Please read the detailed ORI Data Privacy Policy (“Policy”) to understand how your personal information will be treated. This Policy may change from time to time so please note to check back periodically.

1.0 About Us And This Policy

ORI is a private company limited by shares. We are a trusted advisor and partner for businesses, investors, global development agencies and the public sector in the design and implementation of world-class investments and strategies, that also advance social impact goals. We passionately deploy our capabilities with the aim of **Shaping Opportunities for Africa’s Growth**.

This Policy strictly applies to our business contacts, individuals who sign up to receive our publications and bulletins via our website and generally. We take our privacy responsibilities seriously and are committed to protecting and respecting your privacy. Further, this Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We are also dedicated to making your online experience informative and beneficial to your business. We truly appreciate your presence on our site and understand that you are our guest at all times and should be treated accordingly. This Policy outlines how and why we collect, process, and handle personal information. The Policy informs individuals (“you”, “your”, or “their”) about their rights regarding this data. It applies to personal data provided to us, both by individuals themselves or by others. We aim to be transparent about why and how we process personal data.

This Policy is issued on behalf of ORI. For the purpose of this Policy and applicable privacy legislation, the Data Controller is Onward Resources International Limited with physical location at Kalamu House, Plot 1B Kira Road, P.O. Box 29724 Kampala, Uganda. Our company number is 80010004031769.

2.0 Relevant Regulations

For the purposes of personal identifiable information and data, ORI's Policy is designed to meet the requirements of, and uphold the principles in the European Union's ("EU") General Data Protection Regulations ("GDPR"), and all other applicable law in the jurisdictions where ORI works. ORI utilizes the definition in the GDPR of personal data for the purposes of this Policy. Pursuant to, and in alignment with that definition, ORI considers personal data to be information in any format that relates to an individual who can be identified by that information either on its own or when it is combined with other information held by us. To earn and maintain your trust, we are committed to protecting the privacy and security of the personal data we have about users of our website, our clients, and our clients' accounts. This Policy is intended to help you understand our practices for collecting, using, maintaining, and disclosing your personal data.

3.0 Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. If and when you leave our website, we encourage you to read the privacy policy of every website you visit.

4.0 The Personal Information We Hold About You

We may collect, store and use personal data about you (referred to throughout this Policy as "**Personal Information**"). Personal Information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Information about you including your name, email address and contact data. ORI collects Personal Information in a lawful and fair manner, and it will only be obtained from you if it is deemed reasonable and practicable. We will only collect Personal Information where the data is reasonably necessary for a genuine business-related purpose. This data is typically collected directly from you for the agreed purposes of potentially receiving services from you, receiving services from us, or keeping you informed about ORI's work.

We collect Personal Information in a number of ways. This can be done directly from you or your custodians, either via telephone, Web form or email, or via automated tools which are embedded in our technology platform (e.g. this website). Some of the automatically collected information is Personal Information, some of it is not.

The types of Personal Information we may collect (using a variety of ways as indicated above) includes:

4.1 Business Contacts

- Contact details such as your name, title, gender, postal address, facsimile number, business telephone number and business e-mail address.
- Occupation, references and previous employment history, qualifications and skills.
- Information provided by you through our website or, if applicable, social media (such as Facebook, Instagram, or X accounts, among others).
- Information provided through other public media forums (e.g. LinkedIn, Devex, etc.);
- Your contractual and performance history with us.
- Information that you provide or we collect during our interactions with you or your employer, such as how long we have done business with you or how long you have worked at your company.
- Applications or responses submitted by you for the delivery of services.

4.2 Notification Subscribers

- We hold personal contact details including names and email addresses of all our subscription subscribers.
- For our careers notifications subscribers, we additionally hold information about your preferred job category and type, country, preferred office location and whether you are interested in full or part time jobs.
- Information that you provide or we collect during our interactions with you following your subscription request.

4.3 Contact Enquiries From “Contact Us” or “Reach Out to Us” Form on Our Website

- Personal contact details such as your name, email address, telephone number and your location.
- Information that you provide or we collect during our interactions with you following receipt of your enquiry.

4.4 Generally

- Any Personal Information you provide to us during your interactions with us.
- Information provided to us by third party service providers we work with, for example, analytics providers.
- If applicable when you follow our social media accounts, and register or subscribe to our mailing list.
- Applications by you to attend events such as conferences, meetings, and trainings.
- Through direct communication between you and ORI personnel, such as email, mail, by telephone and direct/face to face meetings.
- Automatically/technically collected Personal Information based on the use of our website. This information is gathered through our servers’ log files. These log files record information such as: IP-address; number of visits our website receives; the types of

browsers and operating systems used; time zone difference to Greenwich Mean Time (GMT); requested site or file; date and time of your request; web page where the request originated; status of this request (file transferred, file not found etc.); and amount of data transferred. This log file information allows us to improve our website, create better content, ensure that content is presented in the most effective manner for you and your computer, and deliver a more personalized service. To this end, the legal basis for this kind of processing is our legitimate interest as described by GDPR Article 6(1)(f).

ORI primarily relies on the consent of individuals to collect, process, and hold their data. You may opt not to provide consent or not provide certain Personal Information requested; however, doing so may result in ORI not being able to provide you with services or contact you. ORI strives to keep the Personal Information we hold relevant, updated, and correct. If there is a change in your personal data, please inform ORI so that we may update your information.

Furthermore, we will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5.0 How We Use Your Personal Information And The Legal Basis For Doing So

We will only use your Personal Information when we have a legal ground for doing so. The legal basis for the collecting and the processing of Personal Information depends on the purpose for which we use the personal data. In some instances, the basis for processing is your consent. However, in many cases, the legal basis for processing will be ORI's legitimate interest specifically relating to the administration of our website. Note that should you believe that your interest outweighs ORI's interests, you may object to such processing as described in this Policy. Finally, ORI may process Personal Information pursuant to the performance of a contract.

In summary, the following are (amongst others) the legal grounds by which we can use your Personal Information:

- Where you have provided us with your consent for us to do so.
- Where we need to perform a contract that we have entered into with you or to take steps to enter into a contract with you.
- Where we need to comply with a legal obligation to which we are subject.
- Where it is in pursuit of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

More specifically, we will use the Personal Information we collect about you for following purposes:

- To help us understand better about how our site is used and to be able to send you communications that may be of interest to you, either electronically or otherwise.
- To provide you with services consistent with our expertise and capabilities.

- To assess your suitability for potential delivery of services or contracting and receiving services from you.
- To submit work products and documents to our clients, and partners.
- To keep you informed about ORI's work, products and services. This may include technical information and/or marketing information – *in pursuit of our legitimate interests in keeping you informed about our products, services and business updates*. In addition, to provide you with information via our subscription services – *with your consent following your completion of our subscription sign up procedure via our website*. For our careers notifications subscribers, we use your job details (expertise and type), preferred office location and whether you are interest in full or part time jobs.
- Compliance with applicable laws or other legal requirements.

5.1 What Happens If You Fail To Provide Personal Information?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of visitors to our premises).

6.0 Sharing of Personal Information

ORI will only share your Personal Information with others when we are legally permitted to do so. ORI includes contractual language with third parties regarding data protection, confidentiality, and security guidelines. If your Personal Information is subject to the European Union (EU) GDPR, ORI ensures that any transfer of data will be under an agreement which covers the EU requirements for the transfer of Personal Information outside the EU, such as the European Commission approved standard contractual clauses.

The Personal Information that ORI holds may be transferred to the following types of organizations:

- Contractors and/or sub-contractors who are providing services to us in relation to services we provide to our clients.
- Third-party organizations that provide support services (e.g. insurance providers).
- Professional advisors, such as lawyers, auditors, and accountants.
- Clients or potential clients for marketing purposes or where you apply to work with us.
- Law enforcement, government, or other regulatory agencies as provided for by law.

ORI does not sell your Personal Information to third parties under any circumstances.

6.1 Retention Of Personal Information

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for. As a policy, we do not keep Personal Information for longer than reasonably required. We assess the appropriate retention period for different information based on the size,

volume, nature and sensitivity of that information, the potential risk of harm to you from unauthorized use or disclosure of that information, the purposes for which we are using that information, applicable legal requirements for holding that information, and whether we can achieve those purpose(s) through other means.

In summary, the duration of time for retaining Personal Information depends on the nature of the Personal Information and the purposes for which it was received. Our Personal Information retention is informed by:

- Any legal, policy or regulatory requirements of the location of the data processing.
- The completion of a contract with you or work you supported with our clients. Where we have collected your Personal Information during the course of your and our organizations doing business, we will keep your Personal Information for as long as this business continues, or for as long as we have a commercial interest in holding your Personal Information, for example, with a view to doing business in the future.
- Reasons other than legal requirements or contractual arrangements. Where you have provided us with your contact details to receive one or more of our subscriptions (newsletters, alerts, etc.) or hiring database, we will maintain this Personal Information until you have unsubscribed from receiving our communications, or until you request its removal or correction.

Where you have sent us a contact enquiry form we will keep your Personal Information in accordance with our Email Storage Policy which provides for indefinite retention of email.

6.2 Your Data Protection Rights Including Access, Correction, Erasure And Restriction

For the purpose of this Policy, we are a Data Controller of your Personal Information.

If you are from the European Economic Area (EEA), our legal basis for collecting and using your Personal Information, as described in this Policy, depends on the information we collect and the specific context in which we collect it.

We may process your Personal Information because:

- We need to perform a contract with you, such as when you use our services.
- You have given us permission to do so.
- The processing is in our legitimate interests and it is not overridden by your rights.
- To comply with the law.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. GDPR details an individual's rights regarding their Personal Information. ORI respects and supports these rights and applies them to the Personal Information that we hold. These rights include:

- The right to access. Subject to certain conditions, you have the right to request access to your Personal Information (known as a “data subject access request”) that we have about you. This enables you to receive a copy of the Personal Information we hold about you. You may contact ORI to request a copy of your Personal Information held by us.
- The right of rectification. You have the right to request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. You have a responsibility to help us to keep your Personal Information accurate and up to date.
- Right of Erasure. Subject to certain conditions, you are entitled to have your Personal Information erased (e.g. where your Personal Information is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful).
- Right to Data Portability. Subject to certain conditions, you are entitled to receive the Personal Information which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.
- Right to Object to or Restrict Processing. Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your Personal Information, for example so as to establish its accuracy, or the reason for processing it.
- Right to Withdraw Consent. As stated above, where our processing of your Personal Information is based on your consent to the collection, processing and transfer of your Personal Information for that specific purpose, you have the right to withdraw your consent at any time. If you withdraw your consent, this will only take effect for future processing and is subject to certain conditions based on ORI’s legal and contractual obligations.

If you want to review, verify, correct or request erasure of your Personal Information, object to the processing of your Personal Information, or request that we transfer a copy of your Personal Information to another party, please submit the request regarding these rights in writing to ORI by following the instructions in the “**Contact for Requests and Complaints**” section below. Note that we may request additional information regarding the specifics of the request as well as confirm your identity. This is a security measure to ensure that Personal Information is not disclosed to another person who has no right to receive it. We will respond to these requests in accordance with regulatory requirements once we confirm the validity of the request.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information.

6.3 No Fee Usually Required

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

6.4 How We Protect Your Personal Information, And How We Address Any Breaches Of Personal Information

ORI maintains reasonable and appropriate administrative, technical and physical safeguards to protect the Personal Information we maintain against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We also monitor our systems for possible vulnerabilities and attacks. However, no system is 100% secure. We cannot warrant the security of any information that you send us, and we cannot guarantee that your Personal Information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If a data breach that included Personal Information were to occur, ORI will respond to the breach as required by the relevant regulations. If you are aware of a breach of Personal Information that concerns ORI, please contact: policies@theorigroup.com immediately.

6.5 Information Collected By ORI's Website

Like many websites, ORI uses cookies in order to provide you with a more personalized web service. We use HTTP cookies to improve the performance of our site. A cookie is a text-only string of information that we pass to your computer's hard disk through your web-browser so that the website can remember who you are. Cookies cannot be used by themselves to identify you – and all data is anonymized. No personally identifiable information is collected or maintained without the user's consent. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. For more information about cookies, please see www.allaboutcookies.org

6.6 Photos And Videos That ORI Utilizes

One of the several ways in which we showcase the type and impact of our work is by utilizing images collected by our team of experts in the course of the engagements we undertake. ORI seeks consent to the degree practical from the individuals depicted in these images. Even so, if your likeness is reproduced in any of the images hosted on the ORI website and you would like these images to be deleted, please reach out to us and we will take the requested action.

7.0 Type of Third Parties We Might Share Your Personal Information With

We employ third party companies and individuals to facilitate our Website ("Service Providers"), to maintain our Website on our behalf, to perform Website-related services or to assist us in analyzing how our Website is used. These third-parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. In this regard, we require third parties to respect the security of your Personal Information and to treat it in accordance with the law. For example, where we instruct third party service providers, we carry out due diligence on those providers to ensure they treat your Personal Information as seriously as we do.

We may share your Personal Information with the following types of third parties:

- Technical support providers, for example, contracted firms assisting with our website.
- Professional advisers such as lawyers, accountants and business analysts.
- Other ORI group companies which are bound by this Policy.
- Providers which help us collate and organize information effectively and securely.
- Providers which help us generate and collate surveys and reviews of our products and services.
- Providers which assist us with marketing by, for example, helping us send marketing mailshots.
- Third party software hosting companies which provide us with software solutions.
- Providers which host our servers in their data centers.

Where we use third party service providers to assist us, your Personal Information may also be stored in accordance with their practices and procedures. We require third parties to respect your Personal Information and to treat it in accordance with the law.

Our Headquarters:

Onward Resources International Ltd
Kalamu House, Plot 1B Kira Road
P.O Box 29724 Kampala
Uganda

Email: policies@theorigroup.com

8.0 Communication Preference

Where we are providing you with marketing information, you can also change your marketing preferences by using the “Unsubscribe” button at the bottom of our marketing e-mails sent to you.

Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

9.0 Changes To This Data Privacy Policy

ORI reserves the right to change, modify, add or remove portions of this Data Privacy Policy at any time and any changes will become effective immediately. Any material changes that we may make to this Policy, including but not limited to how ORI will use your Personal Information, will be posted on our website and on this page. When we post changes to this Policy, we will revise the “last updated” date at the bottom of this statement. If the change involves the use of your personally identifiable information, the notice will contain instructions on how you can opt-out of such use. We encourage you to periodically review this statement to be informed of how ORI is protecting your information.

10.0 Contact For Requests And Complaints

If you have any questions about this Policy, our privacy practices, or wish to submit a request regarding your Personal Information, or to submit a complaint, please contact us at policies@theorigroup.com

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