

## **SPADES Insurance Brokers Limited (Privacy Policy)**

**Effective Date:** 06<sup>th</sup> July 2026

SPADES Insurance Brokers Limited ("SPADES", "we", "our", or "us") is committed to protecting your privacy and personal information in accordance with the Data Protection and Privacy Act, 2019 and the Data Protection and Privacy Regulations, 2021 of Uganda.

This Privacy Policy explains how we collect, use, disclose and safeguard your personal information when you use our website (<https://spades.co.ug>) and any products or services provided by SPADES.

### **Information We Collect**

We may collect the following information when you use our services:

#### 1) Personal Information

- Full name
- Email address
- Telephone number
- Physical address
- Payment information (processed through authorized payment service providers)
- Any other information you voluntarily provide when registering, requesting services or contacting us.

#### 2) Non-Personal Information

We may automatically collect technical information including:

- Browser type
- Device information
- Operating system
- Internet service provider
- Usage and website analytics information.

### **Children's Privacy**

Our services are intended for persons aged 18 years and above. We do not knowingly collect personal information directly from children. However, where a child is named as a beneficiary under an insurance policy, we may process limited personal information relating to the child as provided by the policyholder for the purpose of administering the insurance contract. Such information is collected and processed only as necessary to provide insurance services and in accordance with applicable law.

### **Cookies**

Our website may use cookies to improve your browsing experience and enhance our services. You may disable cookies through your browser settings, although some features of the website may not function properly.

### **How We Use Your Information**

We use your information to:

- i) Provide insurance products and related services;
- ii) Process payments and transactions;
- iii) Respond to enquiries and provide customer support;
- iv) Improve our website and services;
- v) Personalize your user experience;
- vi) Conduct surveys or promotional campaigns;
- vii) Send service-related notices regarding your policies, claims and transactions;
- viii) Send marketing communications where you have provided your consent;
- ix) Comply with legal and regulatory obligations.

We do not sell your personal information to third parties.

### **Legal and Regulatory Basis for Processing**

SPADES processes personal information in accordance with applicable Ugandan laws, including the Data Protection and Privacy Act, 2019, the Insurance Act, Cap 191, and Anti-Money Laundering and Counter-Terrorism Financing regulations.

We process your personal information where:

- i) You have provided your consent;
- ii) Processing is necessary to provide our insurance services;
- iii) Processing is required by law, including regulatory and AML/CFT obligations; or
- iv) Processing is necessary for our legitimate business interests, provided your rights are not overridden.

### **Location Data**

Where required for insurance inspections, the SPADES mobile application(s) may collect your device location to record the latitude and longitude on inspection photographs for verification purposes. Location information is collected only during inspections and is not accessed in the background.

### **Consent to Receive Communications**

By using our services, you consent to receive service-related communications concerning your account, policies, claims and transactions.

Where you have separately consented, we may also send marketing and promotional communications by phone, SMS, email, WhatsApp, push notifications or other electronic communication channels. You may opt out of marketing communications at any time.

### **Sharing Your Information**

We may share your personal information with trusted third-party service providers where necessary to:

- process payments;
- provide our services;
- maintain our systems;
- comply with legal obligations; or
- support our business operations.

Some of your personal information may be stored or processed outside Uganda by our trusted service providers, subject to appropriate data protection safeguards.

We require all service providers to protect your information and use it only for the specific purposes for which it was shared.

Our website may also contain links to third-party websites. SPADES is not responsible for the privacy practices or content of those websites.

### **Protecting Your Information**

We implement appropriate technical and organizational measures to safeguard your personal information against unauthorized access, alteration, disclosure or destruction. These measures include secure communications, encryption, access controls, authentication procedures and staff confidentiality obligations.

We implement appropriate technical and organizational security measures to protect your personal information. However, while we take reasonable steps to safeguard your data, no method of transmission or electronic storage is completely secure, and we cannot guarantee absolute security.

### **Your Rights**

Subject to applicable law, you have the right to:

- Access your personal information;
- Request correction of inaccurate information;
- Request deletion of personal information where legally permissible;
- Withdraw consent where processing is based on consent;
- Object to certain processing activities;
- Request restriction of processing; and
- Lodge a complaint with the Personal Data Protection Office.

### **Data Retention**

We retain personal information only for as long as necessary to provide our services, comply with legal and regulatory obligations, resolve disputes and enforce our agreements.

### **Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. Any changes will be published on this page together with the revised effective date. Continued use of our services after such changes constitutes acceptance of the updated Privacy Policy.

### **Data Controller and Contact Information**

SPADES is the Data Controller responsible for collecting and determining the purposes and means of processing your personal information.

Email: [info@spades.co.ug](mailto:info@spades.co.ug)

Telephone: +256 200 910 906

Address: Plot 875, Makerere Kavule, Bombo Road, P.O. Box 75443, Kampala, Uganda

### **Acceptance of this Privacy Policy**

By accessing or using our website or services, you acknowledge that you have read, understood and agree to this Privacy Policy.