

# **PRIVACY POLICY**

## **1. INTERPRETATION AND DEFINITIONS**

### **Interpretation**

In this Privacy Policy ("Policy"), unless the context otherwise requires, words in the singular include the plural and words in the plural include the singular; references to any gender include all genders; and references to statutory provisions include those provisions as amended, re-enacted, or replaced from time to time.

Headings are provided for convenience only and do not affect the interpretation or construction of this Policy.

Any reference to "including" or "includes" shall be interpreted as "including without limitation."

References to "you," "your," or "User" refer to any individual who accesses or interacts with the Platform in any capacity. References to "we," "us," or "the Company" refer to Feasts Consultants International Ltd.

### **Definitions**

For purposes of this Privacy Policy, the following terms shall have the meanings assigned below:

- "Platform" refers to the Feasts Agri-Jobs digital employment platform operated by Feasts Consultants International Ltd., including all associated web pages, databases, tools, mobile interfaces, software, communication features, and service components accessible to Users.
- "Company" means Feasts Consultants International Ltd., its directors, officers, employees, subsidiary initiatives, agents, and any authorized representatives or service providers engaged in operating, maintaining, securing, or improving the Platform.
- "User" means any individual who accesses, visits, registers on, or interacts with the Platform in any manner, whether as an Employer, Job Seeker, browser, or any other participant.

- “Employer” means any User who posts job vacancies, searches for talent, communicates with Job Seekers, pays for services, accesses candidate information, or otherwise utilizes the Platform for the purpose of recruitment or workforce engagement.
- “Job Seeker” means any User who creates a profile, submits personal information, applies for job opportunities, or otherwise engages with the Platform in pursuit of agricultural employment, whether verified or unverified.
- “Verified Job Seeker” refers to a Job Seeker who has undergone the Company’s physical verification and assessment process, paid the applicable verification fee, and been formally designated by the Company as meeting the established verification standards.
- “Unverified Job Seeker” means a Job Seeker who has not undergone the Company’s verification process, whose verification is pending, or whose verification status has expired or been revoked.
- “Personal Information” or “Personal Data” means any information that identifies, relates to, describes, or can reasonably be linked, directly or indirectly, with a specific individual. This includes, but is not limited to, names, contact information, identification documents, demographic details, employment history, geolocation data, profile submissions, and any information voluntarily submitted through the Platform. This definition is intended to align with the meaning of personal data under the Uganda Data Protection and Privacy Act, 2019.
- “Processing” means any operation or set of operations performed on Personal Information, whether or not by automated means, including collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination, restriction, erasure, or destruction.

- “Service” means all features, functionalities, modules, and tools provided through the Platform, including but not limited to job posting, candidate matching, access to contact information, messaging tools, verification services, subscription plans, and any other products or innovations offered by the Company.
- “Content” means all information, data, materials, documents, communications, images, job postings, credentials, employment details, and any other submissions uploaded, shared, or provided by any User within or through the Platform.
- “Payment Plan” means the service-access models offered by the Company to Users, including but not limited to Direct Connect, Smart Match, Full Service, and the Instant Connect Pass, each of which provides different tiers of functionality and access.
- “Third-Party Service Providers” means any independent organizations or individuals engaged by the Company to support Platform operations, including data-hosting providers, analytics partners, payment processors, customer support systems, and communication platforms.
- “Cookie” is a small text file that is stored on your device (such as your computer, tablet, or mobile phone) when you visit a website.
- “Agreement” means this Privacy Policy read together with the Platform’s Terms and Conditions, the Employer Compliance & Verification Policy, the Safety Notice & Disclaimer, and any other policies referenced therein or adopted by the Company from time to time.

## **2. INFORMATION WE COLLECT**

We collect personal information only to the extent necessary to operate, maintain, and improve the Feasts Agri-Jobs Platform, to facilitate safe and lawful job-matching, and to fulfill our obligations under Ugandan law, including the Data Protection and Privacy Act, 2019. Information is collected directly from Users, automatically through the Platform, and from legitimate third-party sources where appropriate.

### **Information We Collect from Job Seekers**

The Platform collects a broad range of information from Job Seekers to enable accurate skills assessment, candidate profiling, and job-matching functionalities. This information may include:

### **Information Provided Voluntarily by Job Seekers**

This includes personal and professional information that you submit when creating an account, completing your profile, applying for jobs, or undergoing the verification process. Such information may include:

- Identification and Contact Details: Full name, phone number, email address, residential location, emergency contact, age or date of birth (where required for legal eligibility).
- Government-Issued Identification: National ID, passport or other identity documents, submitted voluntarily or as part of the verification process.
- Employment and Skills Information: Employment history, farming experience, education level, training certificates, technical skills (e.g., milking, spraying, tractor operation, animal husbandry), languages spoken, and other qualifications necessary for job placement.
- Personal Profile Information: Job preferences, preferred salary range, willingness to relocate, work availability, and any additional personal description the Job Seeker chooses to provide.
- Verification and Assessment Information: Photographs, skills demonstrations, assessment results, physical verification notes, and any documentation required to upgrade to Verified Job Seeker status.
- Communications: Messages exchanged with Employers through the Platform, complaints, feedback, or inquiries submitted to the Company.
- Payment Information: If applicable, information needed to process payments for verification or other premium services. The Company does not store bank card details on its servers.

### **Information Collected Automatically from Job Seekers**

When a Job Seeker accesses the Platform, the following information may be collected automatically:

- Device and browser information
- IP address and approximate geographic location
- Cookies, session identifiers, and analytics data
- Log data relating to profile edits, job applications, time spent on pages, and interactions with features

This information helps us enhance the Platform's security, functionality, and user experience.

### **Information Collected from Third Parties Regarding Job Seekers**

Where permitted by law and applicable to our verification or safety procedures, we may obtain:

- Verification or background information from authorized third-party providers
- Information from publicly accessible sources (e.g., local council records confirming residence)
- Relevant feedback or performance reports from previous Employers regarding workplace conduct, professionalism, or safety concerns

We do not collect biometric data, unnecessary financial records, or information unrelated to job-matching or verification.

### **Information We Collect from Employers**

To ensure the legitimacy, safety, and reliability of job opportunities posted on the Platform, we collect information both about the Employer and the agricultural business they represent.

### **Information Provided Voluntarily by Employers**

Employers provide the following types of information when creating an account or posting a job:

- Identification and Contact Details: Full name, business name, phone number, email address, and preferred mode of communication.
- Business Verification Information: To protect Job Seekers and uphold safe recruitment practices, we may collect:
  - Farm or agribusiness location
  - Business registration documents (where available)
  - Type of farming enterprise (crop, livestock, mixed production)
  - Scale of operations (acreage, herd size, production capacity)
  - Ownership or management information needed for due-diligence checks
  - References or publicly available business records

- **Job and Recruitment Details:** Description of job roles, required skills, working conditions, salary range, work schedules, accommodation availability, and any benefits or obligations relevant to the advertised position.
- **Communications and Feedback:** Messages exchanged with Job Seekers, reports, complaints, performance evaluations after engagement, or any information voluntarily provided during dispute resolution processes.
- **Payment Information:** Data required to complete payments for service packages such as Direct Connect, Smart Match, Full Service, or Instant Connect Pass. We do not store bank card details.

### **Information Collected Automatically from Employers**

As with Job Seekers, we automatically collect:

- Device information, browser type, and operating system
- IP address and rough location
- Cookies, analytics, and usage data
- Log records on job postings, edits, downloads, and candidate interactions

This information helps us detect suspicious activity, prevent fraud, and improve service delivery.

### **Information Collected from Third Parties Regarding Employers**

To maintain a safe ecosystem and protect Job Seekers, we may obtain information from:

- Public business registries
- Local government offices (e.g., confirming farm location, land ownership where relevant)
- Previous Job Seekers who have worked with the Employer
- Regulatory authorities, where safety issues or unlawful practices have been reported
- Agricultural sector partners or cooperatives with whom Employers may be affiliated

The purpose of this information is strictly to verify legitimacy, improve job-matching accuracy, reduce fraud risk, and promote worker safety.

### **General Information Collected from All Users**

Regardless of User type, we may collect:

- Platform usage analytics
- Preferences and settings
- Device and technical logs
- Cookies and tracking technologies for security and functionality
- System-generated identifiers

We do not knowingly collect information from individuals under the age of legal employment in Uganda.

### **3. HOW WE USE YOUR INFORMATION**

We use the personal information collected through the Feasts Agri-Jobs Platform for the purpose of delivering, securing, regulating, and lawfully administering our employment-matching and recruitment services. All Processing is carried out in accordance with the Data Protection and Privacy Act, 2019, the Employment Act, labour recruitment standards, and all applicable Ugandan laws.

To ensure transparency, this section explains the purposes for which we collect and process information relating to Job Seekers, Employers, and all Users.

#### **How We Use Information of Job Seekers**

We process Job Seeker information for the primary purpose of providing safe, transparent, and effective job-matching, verification, and protection services. This includes:

##### **Provision of Job-Matching and Platform Services**

- Creating, maintaining, and updating your account and profile for recruitment purposes.
- Using your skills, experience, preferences, and verification data to power our job-matching algorithms and identify suitable opportunities.
- Allowing Employers to view information necessary to assess your suitability for a role.
- Facilitating lawful communication between you and Employers through the Platform.
- Displaying your profile when Employers search for candidates.

## **Controlled Release of Contact Information**

- Where an Employer purchases a service package, we may disclose your contact details solely for the purpose of enabling lawful recruitment engagement.
- Such disclosure occurs strictly in accordance with this Policy, our Terms, and Uganda's data-protection requirements.

## **Verification and Safety Measures**

- Assessing your identity, skills, and qualifications for verification and safety purposes.
- Maintaining internal records of assessments, feedback, or reported concerns.
- Detecting fraudulent accounts or impersonation attempts.
- Supporting compliance with anti-trafficking and worker-protection regulations.

## **Communication and Support**

- Sending notifications regarding job matches, payments, connection status, alerts, or service announcements.
- Responding to inquiries, appeals, or complaints.
- Providing updates related to verification or subscription services.

## **How We Use Information of Employers**

We process Employer information to verify the legitimacy of job listings, enhance worker safety, and maintain an accountable and transparent recruitment ecosystem. All processing is carried out under strict confidentiality, security, and access-control safeguards to ensure that Employer data is protected at all times.

## **Provision of Platform and Recruitment Services**

We use your information to:

- Create, authenticate, and manage your Employer account.
- Process job posting details for matching through our controlled algorithms.
- Display your listings to suitable candidates and facilitate secure communication channels.

All such processing is restricted to authorized personnel and protected by technical and organizational security measures.



## **Due Diligence and Business Legitimacy Verification**

To protect Job Seekers and uphold platform integrity, we may use your information to:

- Confirm the existence, operating status, and authenticity of your farm, agribusiness, or organization.
- Validate the intentions behind job postings to prevent fraudulent, deceptive, or unsafe recruitment practices.
- Maintain internal risk-assessment records based on objective indicators such as past interactions, verified performance, or safety-related complaints.

These verification activities are conducted with strict confidentiality, proportionality, and data-minimization safeguards, ensuring that only the information necessary for legitimacy checks is processed.

## **Controlled Release of Employer Contact Information**

- We may disclose specific Employer contact details (such as business phone numbers) to Job Seekers only where they have lawfully obtained access through a permitted service, subscription, or recruitment pathway.
- Any such disclosure occurs under strict access controls, guided by your service plan, our Terms, and applicable data-protection laws.
- Information is never shared for unrelated purposes and is protected through monitoring and traceability protocols to prevent misuse.

## **Communication and Support**

- We use Employer information to:
- Send operational notices, invoices, confirmations, and policy updates.
- Respond to support requests, investigations, or dispute-resolution processes.
- Notify you of candidate applications or relevant account activity.

All communications are carried out using secure, monitored channels, ensuring that your information remains protected throughout the engagement.

## **How We Use Information of All Users**

Some purposes apply to every User of the Platform, regardless of role.

## **Platform Operation and Improvement**

- Maintaining the technical functioning, security, and reliability of the Platform.

- Enhancing system performance, user experience, and service quality through analytics.
- Testing and improving our algorithms, fraud-detection tools, and matching logic.

### **Safety, Security, and Legal Compliance**

We may process information to:

- Detect, investigate, and prevent fraud, unauthorized access, or misuse of the Platform.
- Enforce our Terms, policies, and internal safety protocols.
- Protect Users from exploitation, human trafficking, illegal recruitment, or abuse.
- Maintain audit logs, internal risk files, and identity-verification records.
- Cooperate with Ugandan regulatory authorities (such as law enforcement, labour inspectors, and anti-trafficking bodies) where disclosure is required by law or necessary to protect life, safety, or lawful rights.

### **Communication**

- Sending important administrative notices, changes to policies, or service updates.
- Delivering security alerts or verification requests.
- Responding to customer support inquiries.

## **4. HOW WE SHARE INFORMATION**

We may share personal information collected through the Feasts Agri-Jobs Platform only in the limited and lawful circumstances described below. All disclosures comply with the Data Protection and Privacy Act, 2019, the Employment Act, worker-protection standards, and any other applicable Ugandan regulations.

Sharing is conducted strictly for the purpose of delivering recruitment services, protecting Users, ensuring compliance, and enabling lawful business operations. We do not sell personal information to third parties outside the functional recruitment ecosystem.

## **Sharing Information with Employers**

When a Job Seeker is matched to an Employer through our algorithm or when an Employer purchases a permitted access plan, we may share limited Job Seeker information that is strictly necessary for recruitment purposes.

### **Information Accessible Before Contact Unlock**

Before an Employer pays to access the Job Seeker's contact details, they may view only a restricted profile, which may include:

- Skills, work experience, and relevant qualifications
- General performance results or scores from the verification or assessment process
- Job preferences such as preferred salary range, availability, and work type
- High-level behavioral or communication attributes assessed during verification (e.g., communication score, reliability indicators)

**The following sensitive information is never shared at this stage:**

- Photographs or facial images
- National ID numbers or sensitive identification details
- Full residential address
- Next-of-kin information
- Any information irrelevant to job suitability
- Internal safety or risk notes maintained by Feasts Consultants International

This restricted view ensures that Employers can assess suitability but cannot access sensitive or unnecessary personal data.

### **Information Accessible After Contact Unlock (Paid Access)**

If an Employer lawfully pays for contact access through a service plan (Direct Connect, Smart Match, Instant Connect Pass, etc.), we may disclose:

- The Job Seeker's primary phone number
- Any additional contact details designated for workplace communication

Such disclosure is accompanied by a disclaimer clarifying that:

- Phone numbers may be temporarily unreachable
- Job Seekers may no longer be available for work at the time of contact

- Feasts does not guarantee employment readiness or responsiveness

### **Information Provided Through Messaging Features**

The Platform includes internal messaging and notification systems. Employers may receive messages or automated updates when:

- A Job Seeker applies for a role
- The matching algorithm identifies a suitable candidate
- Feasts communicates system notices, safety alerts, or account updates

These communications may include Job Seeker profile elements relevant to the specific interaction.

### **Sharing Information with Job Seekers**

Job Seekers may receive Employer information that is required to evaluate the legitimacy of a job opportunity, which may include:

- Employer name, business description, and farm or agribusiness details
- Job title, responsibilities, working conditions, and location
- Payment range or remuneration details
- Employer-provided contact details, when disclosed through a permitted connection pathway
- Safety notices or disclaimers associated with the job

We do not disclose sensitive Employer records, internal risk assessments, or proprietary business information.

### **Sharing With Service Providers**

We may share limited personal information with carefully selected third-party service providers that support Platform operations. These providers may include:

- Cloud hosting and infrastructure providers
- Payment processors
- Fraud-detection and account-security tools
- Customer support systems
- Email and communication delivery services

- Data-storage and analytics providers
- Platform maintenance and system-monitoring contractors

All service providers are contractually bound by strict confidentiality, data-protection, and restricted-use obligations and are not permitted to use personal information for their own purposes.

### **Sharing for Legal, Safety, and Regulatory Compliance**

We may disclose personal information when necessary to:

- Comply with a lawful request, court order, warrant, or statutory obligation
- Respond to labour-related inquiries from competent authorities such as:
  - The Ministry of Gender, Labour & Social Development
  - Uganda Police Force
  - Anti-trafficking or worker-protection agencies
  - Local government labour officers
- Protect the safety, rights, or security of Users or the public
- Investigate or prevent suspected fraud, exploitation, human trafficking, unsafe recruitment, or violations of our Terms
- Assist authorities in locating or supporting vulnerable persons at risk

Such disclosures are made with caution and only to the extent required by law or necessary to protect legitimate interests.

### **Sharing During Business Transfers**

If Feasts Consultants International undergoes a merger, acquisition, restructuring, asset sale, or similar corporate transaction, personal information may be transferred to the succeeding entity. Any such transfer will:

- Follow lawful procedures
- Uphold existing privacy commitments
- Maintain or exceed the protections described in this Policy

Users will be notified where required by law or where such changes materially alter how their data is processed.

## **5. YOUR RIGHTS AND CHOICES**

The Feasts Agri-Jobs Platform is designed to collect, process, and utilize the information you provide in order to deliver employment-matching and recruitment-related services. By creating an account and submitting information on the Platform, you acknowledge that such data becomes part of the operational database through which our matching algorithms function.

While we respect and uphold user rights in accordance with applicable Ugandan data-protection and digital-service standards, the following rights and choices apply specifically to the manner in which the Platform operates:

### **Right to View and Monitor Your Profile Information**

You may, at any time, log into your account to view the information you submitted during registration. Because the Platform's matching and verification systems depend on accurate data, we maintain continuous access to such information for operational purposes.

### **Right to Correct or Update Your Information**

Users have the right under Section 16 of the Data Protection and Privacy Act to correct or update their personal information at no cost. You may freely edit your profile details including skills, qualifications, and employment history at any time directly through the Platform.

Verification fees apply only where a User requests Feasts Consultants to *verify* the accuracy of the updated information. Verification is an optional, value-added service that involves independent assessment to confirm the truthfulness of submitted data. Fees are therefore charged for the verification service, not for correcting the data itself.

### **Right to Delete Your Account or Request Erasure**

In accordance with Section 25 of the Data Protection and Privacy Act, Users have the right to request deletion of their account and the erasure of personal data, except where retention is required by law or necessary for safety, fraud prevention, dispute resolution, or compliance with labour or recruitment regulations.

Upon receiving a valid erasure request:

- We will delete or anonymize personal data that is no longer legally or operationally required.

- Certain records may be retained where mandated by Ugandan law (e.g., financial records, fraud-prevention logs, anti-trafficking documentation, or legally required recruitment audit trails).

### **No Right to Restrict or Object to Core Processing Activities**

Because the Platform's core functionality relies on analyzing submitted information to match employers and job seekers, users cannot restrict, limit, or object to the processing of data that is essential to:

- candidate matching,
- contact sharing where authorized through paid access, or
- Regulatory compliance obligations.

### **Right to Decline Browser Notifications**

Users may disable or refuse browser-based notifications at any time through device or browser settings. This choice does not affect your access to the Platform.

### **Right to Withdraw from Marketing Communications**

Where optional promotional messages or marketing updates exist, you may opt out at any time by following the instructions in the communication or by contacting us directly.

### **How to Exercise Your Rights**

Any request relating to updates, corrections, or account-associated concerns may be submitted through the following channels:

Email: [admin@feasts.co.ug](mailto:admin@feasts.co.ug)

Website Contact Page: <https://feasts.co.ug/contact/>

Requests will be addressed within the response timeframe permitted under applicable laws and operational guidelines.

## **6. DATA RETENTION**

The Feasts Agri-Jobs Platform retains personal information only for as long as it is reasonably necessary to fulfil the purposes for which it was collected, including recruitment operations, verification, safety protection, legal compliance, and the maintenance of accurate platform records. Retention periods are therefore determined by operational needs, regulatory obligations, and legitimate business requirements, but not in perpetuity.

### **Operational Retention of User Data**

Personal information provided by Job Seekers and Employers is kept for as long as the User maintains an active account and continues to use the Platform's services. Because our matching algorithms, verification systems, and recruitment workflows rely on the integrity of historical data, profile information forms part of an ongoing operational record for the period in which it remains necessary for the delivery of our services.

This may include identity details, contact information, employment history, skills, verification results, placement records, and communication logs generated through Platform activity.

### **Verification, Accountability, and Fraud-Prevention Retention**

Retention of certain records may continue for a defined period after a User ceases using the Platform, where such records are still required to:

- Support traceability of recruitment decisions,
- Prevent or investigate fraud, misrepresentation, or unsafe behavior,
- Manage complaints submitted under the one-month replacement guarantee.
- Enforce Platform rules and obligations,
- Maintain accurate audit trails for dispute handling and user protection.

Such information is retained only for the duration necessary to satisfy these legitimate purposes.

### **Retention for Legal and Regulatory Compliance**

The Platform may retain information for a specified period to comply with obligations imposed by Ugandan law, including labour-related investigations, anti-trafficking assessments, or lawful requests from regulatory bodies and law-enforcement agencies. Only information strictly required for such compliance will be preserved, and it will be kept no longer than is necessary to meet the legal requirement.

### **Retention for Business and Contractual Requirements**

To preserve transparency and accountability in transactions where Users access paid contact information, the Platform may retain records documenting which data was accessed, by whom, when, and for what service. These records are preserved for a defined period that is sufficient to confirm the validity of transactions, protect Users, and resolve any disputes arising from recruitment activities.

### **Duration of Retention**

Unless a longer retention period is required by law or justified by an ongoing operational need, personal information will be retained for a reasonable period typically not exceeding two to three years after the last active use of the Platform. After this period, information will be securely deleted or anonymized, unless outstanding obligations,



investigations, complaints, or safety considerations require a longer retention period that can be justified under applicable data-protection principles.

### **Secure Storage, Archiving, and Anonymization**

Where data is no longer required for identifiable operational, business, or legal purposes, it will be transitioned to secure archival storage for the remainder of the retention period, or irreversibly anonymized for statistical, analytical, or platform-improvement purposes. Anonymized data is stripped of identifying elements and cannot be linked back to any individual.

## **7. DATA SECURITY**

Feasts implements a multi-layered data-security framework designed to safeguard all personal information entrusted to the Platform. Because our services involve the exchange of sensitive employer and job-seeker information including contact details, work histories, verification outcomes, and transaction logs we prioritize strong protection measures aligned with industry standards for digital recruitment and online service platforms.

### **Technical Safeguards**

We employ a range of technical controls to ensure the confidentiality, integrity, and availability of user data. These include, but are not limited to:

- Encryption protocols that protect data transmitted between user devices and the Platform, as well as encryption applied to stored sensitive fields.
- Secure server environments, hosted on reputable cloud infrastructure with continuous security patching, hardened configurations, and redundancy mechanisms to prevent data loss.
- Role-based access controls (RBAC) that ensure only authorized personnel within Feasts can view or handle specific categories of data necessary for verification, system monitoring, support, fraud checks, or legal compliance.
- Automated activity monitoring and logging that track system interactions, suspicious behavior, access attempts, and abnormalities connected to account misuse or fraudulent activity.
- Regular vulnerability assessments and security reviews to continuously evaluate the Platform's defences, identify potential weaknesses, and implement corrective measures in line with evolving cybersecurity standards.

### **Organizational Safeguards**

Beyond technical protections, Feasts maintains internal processes to ensure that data is handled responsibly throughout its lifecycle. These include:

- Strict confidentiality obligations for staff who administer, verify, or review platform data.
- Controlled internal workflows that limit the categories of staff who can access user information, particularly sensitive fields.
- Verification protocols that ensure data provided by job seekers and employers is reviewed responsibly and used only for legitimate recruitment and compliance purposes.
- Audit-trail preservation, ensuring that all access, modification, or release of data such as when contact information is purchased is traceable and stored securely.

### **User-Side Security Expectations**

While Feasts implements strong protective measures, no digital system can guarantee absolute security. Users are encouraged to take reasonable precautions to protect their own information, including:

- safeguarding passwords and account credentials,
- avoiding the sharing of login details with third parties,
- Exercising caution when responding to calls or messages outside the Platform, especially given the increasing cases of digital fraud targeting farmers and job seekers in Uganda.

### **External Threat Management**

Given the nature of our service and the sectors we serve, Feasts has developed mechanisms to identify and mitigate external threats such as impersonation, phishing, and fraudulent job postings. Suspicious activities are flagged for review, and where necessary, Feasts may suspend or investigate accounts to maintain platform integrity and user safety.

### **Security Incident Response**

In the unlikely event of a data breach or security compromise, Feasts follows a structured incident-response protocol that includes:

- immediate containment efforts,
- internal assessment and logging of the event,
- actions to prevent further unauthorized access,
- And, where legally required, notification to affected users or authorities.

## **8. INTERNATIONAL DATA TRANSFERS**

The Feasts Agri-Jobs Platform operates within a modern digital environment that may involve the controlled transfer or storage of personal information outside Uganda. This may occur where our cloud-hosting partners, communication systems, analytics tools, payment processors, or cybersecurity service providers maintain infrastructure in other jurisdictions. In such cases, your information may be processed in countries whose data-protection regimes differ from those in Uganda.

Feasts ensures that any cross-border transfer of personal data is conducted only where the destination country or service provider offers an adequate and lawful level of protection. To meet this obligation, international transfers occur strictly under safeguards that uphold the confidentiality, integrity, and security of User information. These measures include:

- Contractual protections, such as binding data-processing agreements requiring service providers to handle information only on Feasts' documented instructions and for legitimate operational purposes;
- Technical and security controls, including encryption in transit and at rest, access-limitation protocols, and continuous monitoring to maintain protection regardless of the jurisdiction;
- Rigorous due-diligence assessments of third-party processors to confirm that their security posture, data-handling standards, and privacy frameworks provide a level of protection comparable to what Uganda's data-protection principles require;
- Data-minimization practices that limit international transfer to only what is necessary for the specific service being delivered.

Where the law requires additional guarantees to validate the adequacy of protection, Feasts implements those safeguards before any transfer is allowed. Regardless of the country in which processing occurs, Feasts remains responsible for ensuring that the protection applied to User information meets the standards set out in this Privacy Policy and reflects our ongoing commitment to lawful, secure, and accountable data handling.

## **9. CHILDREN'S PRIVACY**

Feasts Consultants International is fully committed to protecting the privacy, dignity, and safety of children in accordance with the Uganda Data Protection and Privacy Act (DPPA) and Ugandan labour laws governing the employment of minors.

The Feasts Agri-Jobs Platform is strictly intended for use by adults aged eighteen (18) years and above. We do not knowingly permit individuals below the age of 18 to register, access, or use the Platform.

Under exceptional circumstances where Ugandan labour laws explicitly permit certain categories of minors (e.g., children aged 14–17 performing light agricultural work under supervision and with proper authorization), access to the Platform is only allowed when:

1. A parent or legal guardian provides verifiable, informed consent, and
2. All required approvals under applicable labour regulations have been met, and
3. Strict age and identity verification controls confirm the minor's eligibility under the law.

Outside these narrow legal exceptions, no minor is permitted to use the Platform.

### **Collection and Processing of Children's Data**

Feasts does not knowingly collect, process, or store personal information from children without lawful authorization and parental consent. Our onboarding processes including identity verification, mobile number validation, and in-person skills assessment are designed to detect and prevent underage registration.

### **Actions Taken Upon Detection of Underage Use**

If Feasts becomes aware, whether through internal checks, user reporting, or third-party notification, that personal data belonging to a minor has been collected in violation of applicable laws or without proper consent:

We will take immediate corrective action, including:

- Suspending and disabling the account,
- Securely deleting all personal information associated with the minor, and
- Notifying the parent/guardian or relevant authority where legally required.

### **User Responsibility**

We encourage all users to promptly report any suspicion or evidence that a minor has attempted to use the Platform without proper authorization. This enables Feasts to respond swiftly, protect the child's privacy, and remain fully compliant with the DPPA and relevant labour laws.

## **10. COOKIES AND TRACKING TECHNOLOGIES**

The Feasts Agri-Jobs Platform uses cookies, web beacons, pixel tags, and similar tracking technologies (collectively, "Cookies") to enhance user experience, support platform functionality, and collect analytical insights that inform system performance and operational improvements. These technologies are embedded in both the Platform's

web interface and supporting systems, enabling the Platform to provide a seamless, secure, and personalized experience for Employers and Job Seekers.

### **Purpose and Use of Cookies**

Cookies serve multiple operational and functional purposes on the Platform, including but not limited to:

- Enabling core platform functionality, such as maintaining session states during account login, facilitating the matching algorithm, and ensuring secure access to paid services like contact retrieval;
- Analyzing platform usage, including the tracking of page visits, feature interactions, and algorithmic outcomes, which allows Feasts to monitor and optimize the efficiency, responsiveness, and reliability of the Platform;
- Personalizing user experience, such as storing user preferences, tailoring job recommendations, and presenting contextual notifications, ensuring that the content displayed aligns with the skills, preferences, and account status of individual Users.

### **Control and Management of Cookies**

Users retain a measure of control over Cookies through their browser or device settings. Browsers typically allow Users to:

- Block or delete Cookies,
- Receive notifications when a Cookie is set, or
- Restrict certain types of tracking.

However, Users are advised that restricting or disabling essential Cookies may limit access to specific Platform functionalities, including the operation of the matching algorithm, in-app messaging, and the secure display of job postings and contact details.

### **Third-Party Cookies and Tracking**

The Platform may also deploy Cookies or other tracking technologies through trusted third-party service providers, such as analytics, cloud infrastructure, email services, payment gateways, and fraud-prevention tools. These third parties are bound by contractual and confidentiality obligations to process the data solely for purposes consistent with the Platform's operations, including security, performance monitoring, and service optimization. Feasts does not control how third-party vendors use these Cookies outside the scope of the services we provide.

### **Transparency and Access**

Feasts is committed to transparency regarding the use of tracking technologies. Detailed information about the specific types of Cookies, their purpose, lifespan, and

operational impact is available in a separate Cookie Policy, which may be requested by Users at any time. Users are encouraged to review this Policy to make informed decisions about their online activity while using the Platform.

### **Compliance with Legal Standards**

All Cookies and tracking activities are implemented in accordance with applicable Ugandan digital laws and international best practices regarding data protection, user consent, and privacy. While certain operational Cookies are essential for the functioning of the Platform, Users' ability to manage non-essential tracking reflects Feasts' commitment to responsible data stewardship and user autonomy.

## **11. THIRD-PARTY LINKS**

The Feasts Agri-Jobs Platform may contain links, references, or integrations to external websites, platforms, or services that are not owned, managed, or controlled by Feasts Consultants International ("Third-Party Sites"). These links are provided solely for convenience and do not constitute any endorsement, approval, or guarantee of the third party's content, products, or services.

Although the Platform may rely on certain external tools or services such as cloud hosting, analytics, payment processors, or communication systems Feasts does not control how these Third-Party Sites collect, process, store, or secure personal information. Users are strongly advised to review the privacy policies, terms of service, and data-handling practices of any external site before sharing personal information or engaging with those services.

Feasts expressly disclaims all responsibility and liability for the privacy practices, security standards, accuracy of content, or legal compliance of any Third-Party Site. Any interaction between a User and a third party including issues such as data misuse, security breaches, or fraudulent conduct occurs solely at the User's own risk and outside Feasts' responsibility.

Where possible, Feasts limits the automatic exchange of information with Third-Party Sites, and any necessary integrations operate under contractual, technical, and confidentiality safeguards. However, Users acknowledge that once personal information is transmitted to or processed by a Third-Party Site, Feasts cannot guarantee that the same protections provided within the Platform will apply.

## **12. CHANGES TO THIS PRIVACY POLICY**

Feasts Consultants International reserves the right, at its sole discretion, to modify, update, or revise this Privacy Policy at any time to reflect changes in the Feasts Agri-Jobs Platform's operations, technological developments, regulatory requirements, or best practices in data protection. Such updates may be prompted by enhancements to the Platform's functionality, the introduction of new services, changes in Ugandan law or

applicable international data-protection frameworks, or adjustments to our partnerships with third-party service providers.

Any material changes to this Privacy Policy will be prominently communicated to Users through notifications on the Platform, email alerts, or in-app messaging, where technically feasible. Non-material changes may be applied immediately and published directly on the Platform without individual notification, but will remain accessible for Users' review at all times.

The effective date of any update or revision is indicated at the top of this Privacy Policy. Continued access to or use of the Feasts Agri-Jobs Platform following the posting of any revised Privacy Policy constitutes acceptance of and agreement to the updated terms. Users who do not agree with the modifications are encouraged to discontinue using the Platform and, where necessary, take appropriate steps to secure or withdraw their personal information in accordance with the rights and procedures outlined in this Privacy Policy.

Feasts strongly encourages all Users to periodically review this Privacy Policy to remain informed about how their personal information is collected, used, and shared, as well as any modifications to the Platform's practices that may affect their rights or obligations.

### **13. CONTACT US**

Feasts Consultants International is committed to maintaining transparency, accountability, and responsiveness with respect to the collection, use, and protection of personal information on the Feasts Agri-Jobs Platform. Users are encouraged to contact us directly for any questions, concerns, or requests regarding the handling of their personal information, including but not limited to inquiries about data access, updates, corrections, or other privacy-related matters.

For prompt assistance, Users may reach our dedicated Privacy and Data Protection team through the following channels:

Email: [admin@feasts.co.ug](mailto:admin@feasts.co.ug) – Our primary channel for privacy-related inquiries, requests, and notifications.

Telephone: +256 392 46820 – Available during business hours for urgent inquiries or clarifications.

Location: Plot 869 Naalya Road, Ntinda - Kampala, Uganda. For written correspondence, formal requests, or documentation submission.

We encourage Users to provide clear and detailed information when contacting us, including any relevant account identifiers, the nature of the inquiry or request, and supporting documentation where appropriate. This enables our team to respond

efficiently and in full compliance with applicable data protection laws and regulatory obligations.

Feasts Consultants International is committed to addressing all privacy concerns in a timely and professional manner, ensuring that Users' rights are respected and that personal information is managed in accordance with this Privacy Policy, applicable Ugandan laws, and international best practices.

### **Breach Notification**

In the event of any actual, suspected, or reasonably foreseeable personal-data breach affecting information held by the Feasts Agri-Jobs Platform, Feasts Consultants International will take immediate steps to contain, assess, and mitigate the incident. Where the breach poses a risk to the rights, freedoms, or security of any User, Feasts will notify the appropriate regulatory authority without undue delay and, in any case, not later than seventy-two (72) hours after becoming aware of the breach, in accordance with applicable data-protection requirements.

Where the breach is likely to result in a high risk to the User, Feasts will also inform the affected individual(s) as soon as is reasonably practicable, providing clear information on the nature of the breach, the data involved, the potential consequences, and the measures taken or proposed to address the incident.

Feasts will maintain internal breach-management procedures, incident logs, and corrective-action protocols to ensure transparency, accountability, and compliance with regulatory obligations.