



SEMA - INTEGRITY & DATA PROTECTION PRINCIPLES

Contents

INTRODUCTION	2
ABOUT SEMA	2
Integrity	2
SEMA data collectors and managers	2
SEMA Users	3
Duties of SEMA	3
DATA USAGE POLICY	4
Purpose of use	4
Right to use	4
COMPATIBILITY WITH THE DATA PROTECTION LAW	4
Purpose Compatibility	4
Individual Privacy	4
Data Security	4
Compliance to Law	5



INTRODUCTION

THE Integrity and Data Protection Principles stated in this document are created to apply to all platforms and methods through which SEMA collects and stores data, setting out the principles that bind SEMA in its activities as well as detailing the information it is permitted to collect and does collect, store and analyse. All policies, Device Terms and User Privacy notices are incorporated into this document and you agree to comply with all the above and be subject to the provisions hereinafter when you access or use SEMA services.

SEMA is a *stichting* (not-for profit entity) with its legal seat in The Netherlands, and a legal branch with its headquarters in Uganda (Kampala, Innovation Village Block C, Ntinda), and for purposes related with this document you may contact it through email at data@talktosema.org.

Please be informed that this document contains provisions that govern how you may make claims or requests of SEMA regarding its data collection and other related activities. It also explains methods through which you may require certain information or data from SEMA and circumstances and methods through which SEMA may provide additional information

ABOUT SEMA

SEMA aims to increase transparency and accountability of public services by gathering real-time citizen feedback. Through SEMA, citizen¹ engage in an instant, direct, and interactive conversation shortly following their encounter with a public institution. Citizens can also provide their feedback through terminals provided at multiple public service outlets and can opt into general community surveys conducted by SEMA. The application provides citizens a voice in how the government operates and identifies ways to help public institutions develop more user-friendly services based on real-time data.

The SEMA Integrity and Data Protection Principles were developed as a guideline for SEMA employees, contractors, trainees and volunteers to help them execute their duties in a lawful and ethical manner with due respect to clients of SEMA serves and the beneficiaries that it seeks to provide a service to.

Integrity

In order to maintain the integrity of the data SEMA collects and analyses, employees, contractors, trainees and volunteers are required to ensure that they are not in breach of any of the following criteria:

¹ Citizen as used by SEMA refers to any person who while currently residing in Uganda made use of the public institution where SEMA is situated.



SEMA data collectors and managers

SEMA data collectors and managers are employees, contractors, trainees and volunteers of SEMA who are involved in gathering data and or analysing the data collected and making reports about the said data.

- A SEMA data collector or manager cannot, at the same time, also be an employee or contractor of any of the institutions that SEMA gathers data for and any such relationship will, upon discovery invalidate any data that data collector or manager has worked on during his or her employment or contracting with a subject public service institution where the data he or she was working with is directly in relation to that public service institution.
- SEMA data collectors and managers must not accept any monetary or non-monetary benefit for executing their duties with SEMA from any entity other than SEMA. All SEMA data collectors and managers are required to adhere to the policies outlined in the [SEMA Integrity - Anti-Bribery Policy](#)
- SEMA data collectors and managers must continuously check for errors or other compromise of the SEMA data collected in order to ensure the integrity of SEMA data. Data collected by SEMA in subject to systems and processes outlined in the [SEMA DATA MANAGEMENT POLICY](#)

SEMA Users

In connection to using or accessing SEMA services, a user is required to provide an honest opinion of their experience at a given public service station. SEMA users are not expected or requested to reveal their identity while engaging with SEMA's feedback tools. Abusive language, accusations directed at particular individuals or any other defamatory communication shall not be tolerated or considered in the SEMA assessments and evaluations. SEMA accepts under no circumstances the feedback of users who have shared an opinion that was a product of pressure, force, bribery, manipulation or extortion.

In order to qualify to use SEMA services, the user must be an adult of sound mind. Within East African countries, that user must be at least 18 years old and a person who has in the recent past (at least a period of one day) used the services of the local public office in question.

Duties of SEMA

SEMA operates as a non-profit with the aim of improving public services. Its work is ultimately for the social good and it upholds principles of truth and integrity. In order to meet these principles, SEMA has the following responsibilities:

1. To ensure that the data collected is true and devoid of defects;
2. To ensure that the data gathering processes are fair and not marred by any biases on the part of SEMA;



3. To avoid any compromise of integrity or situation which may implicate the same;
4. To avoid the storage of any personal or private information that can identify a person whose data was collected;
5. To protect the privacy of SEMA users;
6. To publish honest and true reports of data gathered in accordance to SEMA's communications with partners and the public.

Any person with interest in the data that SEMA publishes who believes it to be erroneous or otherwise misinforming may bring a claim against SEMA's information through an official complaint to SEMA. Official complaints shall be made by way of email to data@talktosema.org.

SEMA will address all complaints by elaborating to complainants the processes through which the data presented was analysed and interpreted. SEMA may, of its own volition, share primary data with the complainant as long as no personal information of users is shared.

Where SEMA discovers that the complaint against it bares merit, SEMA will adjust its publication in question to reflect the true data and subsequently inform the complainant of the same. If the error may have been due to (suspected) fraud or in abuse of any of the set out principles above, the Board of Directors of SEMA will be informed and an investigation into the matter may be ordered.

DATA USAGE POLICY

Purpose of use

SEMA accesses, analyses and uses data for purposes of public service improvement and in furtherance of Sustainable Development Goal 16.6.

Right to use

SEMA accesses, analyses or otherwise uses data that has been obtained by lawful and fair means where the data is collected and the consent of citizens whose data is used.

Disposal of Personal Data

Any information about a person from which the person may be identified which is collected during the course of an interview is deleted in a timely manner.

COMPATIBILITY WITH THE DATA PROTECTION LAW



Purpose Compatibility

SEMA ensures to the best extent possible, that all of the data which is used for project purposes is adequate, relevant, and not excessive in relation to the legitimate and fair purposes for which the data was obtained.

Individual Privacy

SEMA does not access, analyse or store personal identification data of citizens, the content of private communications without the knowledge or proper consent of the individual. SEMA primarily gathers experience and opinions and does not save or maintain any personal information that could lead to direct identification of an individual without their consent. Where such information may be unintentionally collected, SEMA confirms that it will dispose of it in appropriate and timely ways.

Data Security

SEMA ensures reasonable and appropriate technical and organisational safeguards in order to prevent the unauthorised disclosure or breach of data in the following ways:

1. Risk and Harm Assessment and Risk Mitigation

SEMA performs risk assessments through an external security audit firm annually, and implements appropriate mitigation processes before any new or substantially change in a project is undertaken. Before collecting data from the public, SEMA tests its systems for vulnerabilities and assesses the likelihood of their being easily manipulated or attacked.

2. Data Sensitivity

SEMA takes into consideration the impact that data use can have on individuals and groups of individuals. SEMA ensures that it does not use its data to collectively ascertain private information of users without explicitly communicating this intent to the public.

SEMA further ensures that the potential risks and harms of collecting data are not in excess to the positive impact of the project.

SEMA employs strict standards of care while conducting research among vulnerable populations and persons at risk, children and young people and any other sensitive data.

3. Data Minimisation

SEMA ensures that the data it collects and uses is limited to the minimum amount of data needed for it to meet its objectives and operate successfully.

4. Data Retention

SEMA ensures that the data it receives is used specifically for the project and retained only for the period of time reasonable and justifiable.



Compliance to Law

The SEMA principles and policies comply with the standards set out in the revised version of the Guidelines for the Regulation of Computerised Personal Data Files as adopted by the General Assembly Resolution 45/95 on 15th December 1989 and contained in document E/CN.4/1990/72. This policy applies to the European Union's General Data Protection Regulation (GDPR) 2016/679.

The principles in these policies comply with the privacy laws enshrined in the countries SEMA operates in as well as the laws that apply in the European Union. Where a particular jurisdiction is limited as compared to the provisions of the European Union, SEMA activities in that country are in accordance with the limiting nature of the domestic laws.

Within Uganda, [Data Protection and Privacy Act \(2019\)](#) and Regulations

Within Kenya, [The Data Protection Act 2019](#)

Reasons for which you may contact SEMA

1. To inquire about the personal data SEMA collected from you
2. To request SEMA correct your personal information as collected
3. To request SEMA delete your personal information which was collected

In all cases above, you are required to present evidence that SEMA collected your personal data.

We welcome and appreciate any feedback and input you may have regarding our principles and policies. To contact us regarding further details about our principles and policies please email us at info@talktosema.org.

These Integrity & Data Protection Principles were last updated in September 2021