Re: Petition against Guinness Transporters limited trading as Safe boda selling/sharing Ugandan’s Data with American big tech companies like Facebook.

An NGO called Unwanted Witness Uganda last week released a report implicating SafeBoda – a motorcycle transport company that operates in Uganda, Kenya and Nigeria – in sharing their client’s personal data with third parties without their knowledge or permission as required by Section 7 of the Data Protection and Privacy Act of Uganda, raising legal issues as well as questions of trust.

With the introduction of apps and services where business models rely on the collection, processing and sharing of personal information, people wonder how they can still have control of their information in this digital context. It is thus important to know, among others, what happens to our data once it is collected, how we can access, correct or delete it, how long it will be retained and whether it is shared with any third parties. Uganda become the first country in East Africa to enact the data protection law. We are scared that if companies like safe boda don’t abide by the principles espoused in this law, our national security could be at risk, like we saw recently in 2016 when Russians meddled in the 2016 American presidential elections.

Unwanted witnesses carried out forensic research about SafeBoda’s privacy policy and its practice. When reviewing their privacy policy and comparing it to how the app actually operates, a number of discrepancies were identified.

It was discovered that the SafeBoda app was sharing data with Facebook without the consent of the users. The app used a Facebook business tool known as a Software Development Kit (SDK). Through this SDK, Facebook routinely collected information on SafeBoda’s users via the SafeBoda app.

The SDK collected information on SafeBoda users and sent it to Facebook servers, regardless of whether they were Facebook users or not; this meant that even if the user didn’t have the Facebook app installed on their phone or a Facebook account, the SafeBoda app would still send data to Facebook.

Following unwanted witnesses communication with SafeBoda asking for clarification, they removed Facebook trackers from the application.
Safeboda then proceeded to install a new tracker CleverTap. This Appprovides mobile app analytics – this means that every time a user uses the SafeBoda app, it still sends users’ data to CleverTap, a third-party, without their consent.

It is not the first time CleverTap has been involved in cases of sharing users’ data without their consent. Privacy International, a charity based in London that works at the intersection of modern technologies and rights, discovered this tracker in menstruation applications. The users’ data that’s shared include: the user’s phone type, phone contact number, email address, location, time-zone, user-names, and their carrier (Internet Service Provider)

As a petitioner, I therefore parliament to implore NITA-U, TO use SafeBoda as an example to get other data collectors to make adjustments to meet the required data protection standards and principles:

- Safeboda should offer users a genuine choice to consent to the processing of their data for marketing and analytics purposes, including via third parties like Clevertap that may act as processors. Bundling consent negates users choice
- Safeboda should have clear comprehensive privacy policies and these should be strictly enforced.
- The company should exhaustively specify the third-parties and the exact personal data it shares with them in its privacy policy.
- It is recommended that efforts be taken to establish “pathways” that can be followed by data subjects to allow them, if interested, to understand how their personal data may be being processed by the company and any third parties.

For the sake of national security, safeboda might not be an innocent transportation company its an aggressive processor of Ugandans data to sell it to big tech American companies that are under investigation by their own congress. It’s no surprise that the U.S Department of Justice is bringing anti-trust violations against big tech companies in a bid to break them up.

Data in 2017 surpassed the value of oil, its now a trillion dollar industry. We implore parliament not to take this for granted.

Attached is the detailed findings of the report by the Unwanted witnesses NGO

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