



**UNWANTED
WITNESS**

"Amplifying Voices, Changing lives"

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Thursday 11th April, 2024

Dr. Chris Ndatira Mukiza

Executive Director

Uganda Bureau of Statistics (UBOS)

Statistics House,

Plot 9 Colville Street

P.O. Box 7186, Kampala.

Uganda

*Received by
Anne Komugie
8:00 - 8:15 pm
UBOS on
11/4/24
AKC
0414-706002*

Subject: Privacy and Data Protection Concerns Regarding the Upcoming National Population Census

Dear Dr. Chris Ndatira Mukiza,

The above subject refers.

Unwanted Witness Uganda is a non-governmental organization dedicated to promoting digital rights, online freedom, and the protection of privacy and data in Uganda and beyond.

We hope this letter finds you well. We write to express our gratitude for the commendable efforts of the Uganda Bureau of Statistics (UBOS) in diligently fulfilling its mandate as provided for by the Uganda Bureau of Statistics Act, 1998. Your commitment to gathering accurate and reliable data plays an instrumental role in informing policies and decision-making processes in our beloved country.

As you are aware, the forthcoming national population census scheduled to take place from 9th May 2024 to 19th May 2024 is of significant importance in capturing a comprehensive snapshot of Uganda's demographic landscape. However, we wish to bring to your attention certain privacy and data protection concerns that have arisen in light of this upcoming census.

Census data inherently comprises sensitive personal information, including but not limited to names, addresses, birthdates, and occasionally more sensitive details such as ethnicity or religion. Given the sensitivity of this information, it is imperative that robust measures are in place to safeguard the privacy and data protection rights of individuals.

Specifically, we have identified the following areas of concern:



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1. **Data Security:** Ensuring the implementation of strong encryption protocols to secure census data both in transit and at rest.
2. **Anonymity and Confidentiality:** Guaranteeing strict adherence to anonymity and confidentiality principles to prevent the identification of individuals from census data.
3. **Data Misuse:** Mitigating the risk of data misuse through comprehensive privacy impact assessments and strict access controls.
4. **Data Retention and Disposal:** Establishing clear guidelines for data retention and disposal to minimize the risk of unauthorized access or data breaches.
5. **Data Sharing:** Limiting data access to authorized personnel only and ensuring transparent information regarding data collection methods and purposes.

In light of these concerns, we respectfully request clarification on how the Uganda Bureau of Statistics intends to address privacy and data protection issues during the upcoming census.

Furthermore, we wish to bring to your attention that as of *11th April 2024*, the registration status of the Uganda Bureau of Statistics at the Personal Data Protection Office register is noted as *expired*. Given the imminent commencement of the census on *9th May 2024*, we believe it is crucial for your registration status to be updated to "*Active*" to ensure compliance with *Data Protection and Privacy act 2019* and the *Data Protection and Privacy Regulations, 2021*.

In conclusion, we trust that the Uganda Bureau of Statistics shares our commitment to upholding the privacy and data protection rights of individuals. We remain hopeful that our concerns will be addressed in a timely and effective manner, and we stand ready to collaborate with you to ensure the success and integrity of the upcoming national population census.

Thank you for your attention to this matter.

Sincerely,



Dorothy Mukasa

Executive Director

Unwanted Witness Uganda

Copy:



Ms. Stella Alibatesse
Director, Personal Data Protection Office-Uganda

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