UNHCR Uganda WhatsApp Service: Privacy Notice

December 2025

Please read the Privacy Notice and General Terms and Conditions governing your access as a user to the **UNHCR Uganda WhatsApp Service.** By messaging the service, you are confirming that you understand and agree to these terms and conditions. Upon first interaction with the service, you will expressly be asked to accept these terms and conditions, and by confirming your acceptance when prompted through the WhatsApp interface, you will enter into a legally binding agreement with UNHCR.

Privacy Notice

1. **Who we are**

UNHCR is the United Nations Refugee Agency that provides protection and assistance to refugees, asylum-seekers, stateless, and internally displaced people.

UNHCR collects and uses personal data pursuant to the UNHCR General Policy on Data Protection and Privacy (2022) and Policy on the Protection of Personal Data of Persons of Concern to UNHCR (2015).

This privacy notice will explain how our organization uses the personal data we collect from you when you use our self-service platform ("UNHCR Uganda WhatsApp Service") and your rights relating to our use of your personal data.

2. **How and why, we collect data when delivering UNHCR Uganda WhatsApp Service**

When you interact with the UNHCR Uganda WhatsApp Service, UNHCR processes some personal data based on its mandate, which is needed for the application to work and to be able to reply to your messages and questions.

Your data will be processed by UNHCR and the companies Twilio and Ciptex, technology partners contracted by UNHCR, which support the management of this service through the Twilio Flex platform. The messages will be stored securely with UNHCR and may be viewable by Ciptex, the company which provides IT support and maintenance for the platform.

We will process the following personal data when providing you the service:

- Phone number
- Profile name
- Message content

We will use this data to follow up directly with you about your questions. Your contact details will be shared with relevant service providers or other teams within UNHCR, when needed, to ensure the most adequate response, and to provide you with relevant and timely information and support services as requested by you through the UNHCR Uganda WhatsApp Service.

The following personal data will need to be shared with or processed by UNHCR's technology partners, which is essential for effectively delivering the service through their platform, routing messages from users to UNHCR and back, and facilitating the automation of message delivery based on the content of messages received.

What data	How is your data collected	Who is it shared with
Phone number	Automatically captured from the user's profile	WhatsApp, Twilio, UNHCR, Ciptex
Profile name	Automatically captured from the user's profile	WhatsApp, Twilio, UNHCR, Ciptex

Metadata about your connection (IMEI, MAC address, IP address)	This will be automatically recorded from the user's mobile and connection being used	WhatsApp, Twilio
Message content	The specific information sent by the user, including photos, videos and audio files	UNHCR, Ciptex

Your personal data will not be used for commercial purposes or other purposes that are incompatible with the specific purposes mentioned above.

As the channel of WhatsApp is used for the service, WhatsApp will also capture certain data, depending on your specific account and device settings for the WhatsApp application, in accordance with its Terms of Service and Privacy Policy. However, this is not in any way linked to the UNHCR Uganda WhatsApp Service.

Your data will be stored for a maximum period of 365 days since your last engagement with the service, after which it will be deleted.

There is no automated decision making involved when you use the service.

3. Confidentiality

UNHCR and its technology partners Twilio and Ciptex will keep your personal data safe and confidential, including through WhatsApp's encryption and secure storage in UNHCR private cloud hosting.

For the service to work, your data will be sent to WhatsApp and processed through Twilio when you interact with the service, but they will not see the message content. The content will be seen by the specific UNHCR staff to respond to your questions or make sure automatic answers are working. **UNHCR's support and maintenance service provider, Ciptex, may also have access to your content in order to provide and maintain the WhatsApp Service**, but this will be done on behalf and under supervision of UNHCR.

Under no circumstances will we share your personal data with the government in your home country or any third party other than our technology partners.

If it is necessary to share your data with partners of UNHCR to follow up on your question or case, you will be informed and will be given the chance to opt out.

4. Processing data to prevent harm, report on missing persons or comply with international law

UNHCR may preserve your information and share it with third parties if the organization has a good faith belief that doing so is necessary to prevent death or immediate bodily harm to you and others, help locate refugees or other forcibly displaced who have been reported missing or prevent violations of international law. If we do so, we will do it in compliance with our personal data protection and privacy framework.

5. What are your rights and how can you exercise them?

You have the following rights relating to our use of your personal data:

Access – You can access your personal data by asking about the personal data we process about you by emailing us at: helpline.uganda@unhcr.org

Correction – If you notice that your personal data is inaccurate or incomplete you can ask for its correction by emailing us at: helpline.uganda@unhcr.org

Objection and Deletion – To stop receiving messages from the service, simply message the word "UNSUBSCRIBE" to the service. To opt-out and request to delete your data from the platform, including all messages exchanged with UNHCR, send the word "DELETE". It may take us up to 10 days to process this request and delete your data but we will try to do this as soon as possible.

6. Raising Concerns

UNHCR is committed to working with you to obtain a fair resolution of concerns arising from the use of the service including concerns about privacy. If you believe that we have not been able to assist with your concern through the communication channel set out in Section 5 above, or if you have any other complaint, comment or concern, you have the right to submit a complaint under our internal complaint mechanism. To find information on this mechanism, please visit **help.unhcr.org/Uganda.**

7. Notification of Changes

UNHCR reserves the right to change this Privacy Notice at any time. Whenever changes are made, you will be notified and will need to agree to the new terms in order to continue using the service.