

## **Privacy Policy – Genesis Tickets**

**Last Updated:** Thursday, 23 October 2025

### **1) Who We Are**

This Privacy Policy explains how **Genesis Codeworks Limited** (trading as “**Genesis Tickets**”, “we”, “us”, “our”) collects, uses, discloses, and protects personal data when you use our websites, apps, and services for discovering and purchasing event tickets across Africa.

- **Legal entity:** Genesis Codeworks Limited (URSB-registered, Uganda)
- **Trading name:** Genesis Tickets
- **Role:** Data controller; and in some cases data processor for event organisers (see Annex A)
- **Regulatory note (Uganda):** We comply with the **Data Protection and Privacy Act, 2019** and **Regulations, 2021**, and are registered with the **Personal Data Protection Office (PDPO)**.
- **Contact (Privacy):** +256 749 277 259 / +256 792 359 062 • [privacy@genesistickets.net](mailto:privacy@genesistickets.net)
- **Address:** [Muyenga, Kampala, Uganda]

### **2) Scope & Audience**

This policy applies to ticket buyers, attendees, account holders, newsletter subscribers, site/app visitors, and event organisers/promoters who use our tools. It covers our online properties and support channels across Uganda and other African markets where we operate.

### **3) Key Definitions**

- **Personal Data:** Information that identifies or can reasonably identify a person.
- **Processing:** Any operation performed on personal data.
- **Controller / Processor:** We are a controller for our direct customer relationships; a processor for organisers where we process attendee data on their instructions (Annex A).

## 4) What We Collect

### 4.1 Data You Provide

- Identity & Contact: name, email, phone, postal address, country.
- Account: username, password, preferences.
- Ticketing: events selected, ticket counts, seating, attendee names, special access needs you share with us.
- Payments: billing info, payment references and status (we do **not** store full card numbers; card data is handled by PCI-DSS compliant processors).
- Communications: support requests, complaints, surveys, reviews; call recordings where permitted and disclosed.
- Organiser data (B2B): business contacts, KYC/verification documents where required.

### 4.2 Data Collected Automatically

- Device & usage: IP address, device type, OS, browser/app version, pages viewed, clickstream, timestamps.
- Approximate location: derived from IP or device settings (if allowed).
- Cookies/SDKs: session, analytics, fraud-prevention and (with consent where required) marketing cookies. See **Section 11**.

### 4.3 Data from Third Parties

- **Payment & mobile money partners:** payment confirmations, fraud/risk signals.
- **Identity/KYC vendors:** verification signals where applicable.
- **Event organisers:** attendee lists and entitlements.
- **Marketing partners/social platforms:** if you link accounts or interact with our campaigns.

## 5) Why We Use Your Data (Purposes & Legal Bases)

We process personal data to:

1. **Provide services** (accounts, orders, tickets, confirmations, access control) – *Contract*.
2. **Customer support** (queries, troubleshooting, refunds, disputes) – *Contract / Legitimate interest*.
3. **Safety & fraud prevention** (risk scoring, abuse monitoring, chargeback defence) – *Legitimate interest / Legal obligation*.

4. **Service improvement & analytics** – *Legitimate interest / Consent for certain cookies.*
5. **Marketing & recommendations** – *Consent / Legitimate interest subject to opt-out.*
6. **Regulatory compliance** (tax, AML/CFT, data protection) – *Legal obligation.*
7. **Business operations** (audits, governance, M&A) – *Legitimate interest.*  
You can withdraw consent at any time without affecting prior processing.

## 6) How We Share Data

We share personal data only as needed and under appropriate safeguards:

### 6.1 Payments & Financial Partners (Africa)

To process payments and deliver your orders, we integrate with **industrial payment operators**, including:

- **MTN Mobile Money** (country-specific MTN mobile money entities)
- **Airtel Money** (country-specific Airtel mobile commerce entities)
- **Pesapal** (payment gateway/aggregator enabling **Mastercard** and **Visa** card payments and alternative methods)

**What we share (as needed):** name, phone, email, order ID, amount, currency, billing details, device/IP metadata, and fraud-prevention or KYC signals.

**What we don't keep:** we do **not** store full card PANs or sensitive authentication data; card data is handled by our PCI-DSS compliant partners.

**Their policies:** these operators process your data under their own privacy notices. Please review their terms and privacy policies for details about their processing and retention.

### 6.2 Other Disclosures

- **Event organisers & venues:** attendee lists, seating, access control.
- **Service providers:** hosting, cloud, analytics, messaging, customer support, KYC—bound by confidentiality and data-processing terms.
- **Affiliates & transactions:** if we reorganise or transfer our business, data may move under equivalent protections.
- **Legal & safety:** to comply with laws, enforce terms, or protect rights, security, and property.

We do **not** sell personal data for third-party direct marketing.

## 7) International Data Transfers

Our platform and providers may operate globally. When transferring data across borders (including to payment operators and card schemes), we use safeguards such as contractual clauses, encryption in transit/at rest where appropriate, vendor due diligence, and transfer risk assessments. Where law requires adequacy or specific consents, we comply.

## 8) Retention

- Ticketing & financial records: typically, **7 years** (or longer where required by tax/AML/CFT laws).
- Support logs: typically, **2–3 years**.
- Marketing preferences: until you opt out or delete your account.
- Account data: until deletion plus a short buffer for disputes/backups.  
When no longer needed, we securely delete or irreversibly anonymise data.

## 9) Security

We implement appropriate technical and organisational measures: role-based access, encryption in transit, hardened infrastructure, firewalls/WAF, logging/monitoring, least-privilege admin, secure SDLC, periodic audits, and incident response. No system is 100% secure; protect your credentials and notify us of suspected compromise.

## 10) Children's Data

Our services target adults. In Uganda, a child is under **18**. We do not knowingly collect data from children without verifiable parental/guardian consent. Contact us if you believe a child has provided personal data.

## 11) Cookies & Similar Technologies

We use:

- **Strictly necessary** (session, auth, load-balancing)
- **Analytics** (usage and performance measurement)
- **Functional** (preferences)
- **Marketing/advertising** (with consent where required)  
Manage cookies via your browser/app settings and our consent banner. Disabling certain cookies may affect functionality.

## 12) Your Privacy Rights

Subject to your local laws, you may have rights to **access, rectify, erase, object to or restrict processing** (including direct marketing), **port** data, and **withdraw consent**.

**Uganda (DPPA 2019 & Regulations 2021):** You may also complain to the **Personal Data Protection Office (PDPO)**. We respond within statutory timelines.

**How to exercise rights:**

Email [privacy@genesistickets.net](mailto:privacy@genesistickets.net) or call +256 749 277 259 / +256 792 359 062. We may request verification information. If we cannot comply (e.g., due to legal obligations), we'll explain why.

**13) Marketing Communications**

You can opt out of emails/SMS/app notifications at any time (unsubscribe links, "STOP" for SMS where available, or contact us). If an organiser markets to you directly, their privacy policy applies.

**14) Links, Social, and Third-Party Services**

Our services may link to third-party sites/apps or allow social logins. Your use of those services is governed by their policies.

**15) Changes to this Policy**

We may update this Policy periodically. We'll post the new version with a revised "Last Updated" date and, for material changes, provide a prominent notice. Continued use after changes means you accept the updated Policy.

**16) Contact Us**

**Genesis Codeworks Limited (t/a Genesis Tickets)**

**Phone:** +256 749 277 259 / +256 792 359 062

**Email:** [privacy@genesistickets.net](mailto:privacy@genesistickets.net)

**Address:** [Muyenga-Bukasa, Kampala, Uganda]

For unresolved concerns in Uganda, you may contact the **Personal Data Protection Office (PDPO)**.

## **Annex A – Organisers & B2B Processing (Controller/Processor Roles)**

### **1. Roles**

- **Organiser:** typically the **data controller** for attendee data.
- **Genesis Tickets:** acts as **data processor** when handling attendee data under organiser instructions.

### **2. Our Processor Commitments**

- Process only on documented instructions; implement appropriate security; ensure confidentiality and trained personnel; assist with data-subject requests and incident notifications; use sub-processors under written terms; return/delete data at contract end (subject to legal retention); support audits where agreed.

### **3. Organiser (Controller) Responsibilities**

- Provide lawful instructions and a valid legal basis; furnish privacy notices and obtain any required consents; honour data-subject rights and retention obligations; notify us of any special categories of data you intend to collect.

### **4. International Transfers & Sub-processors**

- We may use global infrastructure and vetted sub-processors (including payment and messaging providers); transfers are subject to appropriate safeguards. A current sub-processor list is available on request.

### **5. Incident Response**

- We will notify you without undue delay after becoming aware of a personal data breach affecting attendee data and cooperate with regulatory and attendee notifications as required by law.