

Data Protection Policy

Development Wheel (DEW)

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Development Wheel (DEW) Data Protection Policy

1. Preamble

Development Wheel (DEW) is working with project participants engaging a large number of stakeholders from different levels. To implement various programs/projects and to continue its activities, DEW needs to collect and preserve personal data of a large number of persons involved in DEW's interventions. From this view, DEW is committed to protect personal data and takes responsibilities regarding the security of project participants, stakeholders, donors, staff members and volunteers data very seriously.

2. Scope

The Data Protection Policy will enable DEW to seek ways to collect, use and protect personal data for appropriate causes and benefits of both organization and individuals. The data protection policy explains what type of data DEW will collect from the community, how and why data will be used, who is responsible and how it will disclose and how DEW will protect it.

2.1 What DEW will collect?

- 2.1.1 Only collect data those are needed;
- 2.1.2 Beneficiaries/stakeholders data;
- 2.1.3 Employees's data;
- 2.1.4 Vendors/contractors' data

2.2 How DEW use it?

- 2.2.1 Data will be used as per need (archive, planning, monitoring, evaluation, research, annual report, donors' report etc.)
- 2.2.2 DEW will make consent from the concern persons/institutes before publication of data in any form (e.g. verbal, written, report/document).

3. Statement

This policy recognizes that DEW has a duty to protect the personal data of the beneficiaries, staff members, volunteers and other stakeholders and institutional data of the donors, partners and other individuals who will be involved in the process. DEW understands its responsibilities to secure data which are collected as a custodian. DEW recognizes the importance of handling personal data securely and confidentially. This policy applies regardless of whether data are stored digitally, on paper or any other form.

This policy describes how these data and information must be collected, handled, remain confidential and store to meet DEW's data protection standards- and to comply with the following part of the constitution of the Constitution of the People's Republic of Bangladesh-Article 43(b) and Right to Information Act, 2009-section 7(h), 7(i) and 7(r).

- Constitution of the People's Republic of Bangladesh-Article 43(b): every citizen shall have the right to the privacy of his correspondence and other means of communication;
- Right to Information Act, 2009-section 7(h), 7(i) and 7(r): any authority are not bound to disclose any information which may reveal the privacy of one's life, any information which may endanger life or physical safety of any person, or any personal information protected by any law;

4. Objectives

This policy ensures:

- 4.1 Comply with the Constitution of the People's Republic of Bangladesh and Right to Information Act, 2009 along with Global Data Protection Regulation (GDPR);
- 4.2 Follow good practices of data protection procedure;
- 4.3 Protect the right of staff, partners, visitors, donors and program participants;
- 4.4 Data is used lawfully with the consent of concern persons, institutes and other stakeholders;
- 4.5 Update, erase or rectify data without delay;
- 4.6 Ensure confidentiality about individual's personal data

4.7 Protect data from the risk of data breach.

5. Principal

The data protection policy is strengthened by eight major principals. These say that personal data must:

5.1 Be processed fairly and lawfully

5.2 Be obtained only for specific, lawful purpose

5.3 Be adequate, relevant and not excessive

5.4 Be accurate and keep up to date

5.5 Not be held for any longer than necessary

5.6 Processed in accordance with the rights of data subjects

5.7 Be protected in appropriate laws

5.8 Not be transferred outside without taking consent of data subject.

6. What is data

According to this policy data means personal data or information of the individuals that relates to very basic information of a person and allows DEW to identify, either directly or in combination with other information that DEW may hold. DEW will collect some personal data from partners, staff, donors and contractors, for example, when somebody donate to DEW, use DEW website, use DEW services or contact.

7. Data Protection

Data protection is the process of safeguarding and maintained confidentiality of the information from corruption.

8. What data DEW collects

DEW may collect and process the following categories of information:

8.1 Personal information, including contact details

8.1.1 For example, name, postal address, telephone number and date of birth, NID number, assets detailed, expenses of the family, income etc.

8.1.2 DEW may collect this when it will required contact us, receive support from DEW or donate.

8.2 Bank details

8.2.1 DEW may collect name, sort code and account number.

8.2.2 DEW may collect this during disbursement of loan or cash transfer.

8.3 Communications

8.3.1 DEW may collect the communications you exchange with.

8.3.2 DEW may collect this when respective person email, write a letter or call.

8.4 Third party information

8.4.1 DEW may collect information indirectly from third parties such as event organizers or fundraising sites, where community/business community have agreed to support DEW and have given their consent.

8.4.2 DEW may wish to check their privacy statement to find out more about how they will process data.

8.5 Social media

8.5.1 DEW may collect or posts messages on social media directed related to the program.

8.5.2 DEW may collect this when person interact with DEW on social media platforms such as Facebook, Youtube etc.

8.6 Website

8.6.1 DEW may collect information about how website is used, such as person searches for information by using cookies. Afterwards, a statement of cookies will included in website.

8.6.2 DEW may collect this when person navigate on DEW website.

8.7 Recruitment

8.7.1 DEW will collect personal data as part of staff or volunteer recruitment process.

8.7.2 DEW will collect this when individuals/person apply for a job for volunteering opportunities with DEW.

8.8 Sensitive personal data

DEW collects and uses personal data that provide to DEW, in relation with the DEW's activities. DEW recognize that many of our donor/program participant hold religious beliefs and, since this can be considered to be sensitive information, DEW put in place policies and procedures to ensure that data is kept secure. This information is only accessed on a need-to-know basis. Unless required by law, we do not disclose your sensitive personal data to any third party without your prior consent.

8.9 Financial data preservation

To avoid missing of any data and free from risk DEW will follow the following-

8.9.1 DEW will entry and updated daily transaction on transaction date

8.9.2 DEW will keep transaction record in two ways-

(i) Manual

(ii) Digital

8.9.3 DEW will preserve final data in three (3) steps-

(i) Desktop

(ii) Google Drive

(iii) Data backup in Removable Hard Disk Drive

Executive Director, sectional/program heads/managers will follow up the above mentioned data preservation system of DEW in daily and Finance Person send updated data to Executive Director at the end of the day.

9. How and why we use personal data

DEW use personal data for the following purposes:

9.1 To manages your donations, request or calls to action

9.2 To fundraise and promote DEW's work, in both financial and non-financial ways

9.3 To communicate with you and continue/ manage our relationship with you

9.4 To personalize and improve your experience when engaging with DEW

9.5 To inform you about your news and ways you may be able to help DEW

9.6 To manage our volunteers

9.7 To maintain and improve our own accounts, records and organizational processes, to fulfill our administrative purposes.

10. Sharing your personal data

DEW does not share its data with any other development organization, public body or commercial organization, unless DEW has to do so either for legal or compliance reasons. However, DEW may need to pass on personal information if required by law or a regulatory body. For example, if requested by a law enforcement agency.

- To ensure proper processing of personal data is lawful, fair and transparent, DEW shall maintain a register system.
- The register of system shall be reviewed at least annually.
- Individuals/data subject have the right to access their personal data and any such request made to the DEW shall be dealt with in a timely manner and follow DEW's information disclosure policy along with the compliance of the constitution of the People's Republic of Bangladesh & Right to information Act.2009.
- Data subject have the right to object to the processing of personal data on legitimate compelling grounds except when it is collected in order to comply with a legal obligation.

11. How long do we keep data?

We will keep your personal data only for as long as we consider it necessary to carry out each processing activity.

12. Risk Statement

DEW relies on information systems and personal data to carry out its day to day operations and to deliver its strategic mission and goals. There is a risk that if the confidentiality, integrity or availability of some or all our personal data is compromised in any way, it may have potentially significant impact on the organization. This impact may include a significant loss of productivity, financial loss or reputational damage.

- Report a breach:
In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, the DEW shall promptly assess the risk to people's right and freedom and report about data breach via DEW website and email. This includes breaches that are the result of both accidental and deliberate causes.
- Access to personal data shall be limited to personal who need access and appropriate security should be in place to avoid unauthorized sharing of information.
- Appropriate backup and disaster recovery solutions shall be kept.

13. Policy Dissemination

- All staff members of DEW should sign and be familiarized with this during orientation program
- In order to successful implementation of the policy, the management of DEW should get involved and encourage all staff members to have access to it.
- An annual reminder with a link to emphasize every office about importance of data protection policy.
- The staff members are strongly encouraged to familiarize and aware themselves about data protection policy before start data collection for project.

14. Compliance with policy

Executive Director, sectional/program heads/managers are responsible for compliance of data protection policy.

15. Executive Body (EB) responsibilities

The EB is ultimately responsible for reviewing this policy.

16. Review of policy

Review will be carried out after five years.