

CESDO Internal Data Protection and Privacy Policy

1. Introduction

CESDO is committed to protecting the privacy and confidentiality of personal data it collects, stores, and processes in the course of its operations. This policy outlines CESDO's approach to data protection, ensuring compliance with Somali data protection laws and international standards such as the General Data Protection Regulation (GDPR), where applicable.

2. Scope

This policy applies to all employees, contractors, volunteers, and partners of CESDO who collect, use, process, or have access to personal data of beneficiaries, partners, employees, and other stakeholders. It applies to all personal data, whether stored electronically or in paper form.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Data Processing:** Any operation performed on personal data, including collection, storage, modification, and deletion.
- **Data Subject:** The individual whose personal data is being processed.
- **Data Controller:** The person or organization that determines the purposes and means of processing personal data.
- **Data Processor:** Any entity that processes personal data on behalf of the data controller.

4. Principles of Data Protection

CESDO adheres to the following data protection principles:

1. **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Data is collected for specific, explicit, and legitimate purposes and not further processed in a way incompatible with those purposes.
3. **Data Minimization:** Only the data necessary for the intended purpose is collected.
4. **Accuracy:** Personal data must be accurate and, where necessary, kept up to date.
5. **Storage Limitation:** Data should not be kept longer than necessary.
6. **Integrity and Confidentiality:** Personal data is processed in a manner that ensures its security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage.

7. **Accountability:** CESDO will be responsible for and able to demonstrate compliance with these principles.

5. Legal Basis for Processing Data

CESDO will only process personal data if one of the following conditions is met:

- Consent has been obtained from the data subject.
- Processing is necessary for the performance of a contract.
- Processing is required to comply with legal obligations.
- Processing is necessary to protect the vital interests of the data subject.
- Processing is necessary for legitimate interests pursued by CESDO or a third party.

6. Data Collection and Processing

CESDO will collect and process personal data only when necessary for the organization's activities, including:

- Beneficiary information for humanitarian assistance.
- Employee and contractor data for human resource management.
- Donor and partner data for collaboration and reporting.
- Information collected during program assessments, monitoring, and evaluation.

7. Data Subject Rights

Data subjects have the following rights regarding their personal data:

- **Right to Access:** Individuals can request information about the personal data held about them.
- **Right to Rectification:** Individuals have the right to request that inaccurate data be corrected.
- **Right to Erasure (Right to be Forgotten):** Individuals can request that their data be deleted when it is no longer necessary for the purpose it was collected.
- **Right to Restrict Processing:** Individuals can request that the processing of their data is restricted.
- **Right to Data Portability:** Individuals can request a copy of their personal data in a machine-readable format.
- **Right to Object:** Individuals have the right to object to the processing of their data for specific purposes.

8. Data Security

CESDO will implement appropriate technical and organizational measures to ensure the security of personal data, including:

- Regular security audits of IT systems.
- Encryption of sensitive data during transmission and storage.
- Access controls to limit who can view and process personal data.
- Regular staff training on data protection and information security.

9. Data Retention

Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal obligations. Retention periods are specified based on the nature of the data and legal requirements. Once the retention period is over, data will be securely deleted or anonymized.

10. Data Breach Response

In the event of a data breach, CESDO will:

- Immediately assess the scope and impact of the breach.
- Contain and mitigate any further damage.
- Notify affected individuals, where applicable, if there is a significant risk of harm.
- Report the breach to relevant authorities in compliance with legal requirements.
- Conduct a thorough investigation and implement corrective measures to prevent future breaches.

11. Third-Party Data Sharing

CESDO will only share personal data with third parties when:

- The data subject has given their explicit consent.
- There is a legal obligation to do so.
- It is necessary for the execution of CESDO's operations, such as sharing data with partners or subcontractors for project implementation, with proper data-sharing agreements in place.

Data sharing agreements will outline the responsibilities of the third party to maintain data confidentiality, security, and compliance with this policy.

12. Data Protection Officer (DPO)

CESDO has designated a Data Protection Officer (DPO) responsible for overseeing compliance with data protection regulations and this policy. The DPO will:

- Provide guidance and training on data protection matters.

- Monitor compliance with data protection laws and policies.
- Act as a point of contact for data subjects and the supervisory authority.

Contact Details of DPO:

Name: Hassan Ibrahim

Email: ihassan@cesdo.org

Phone: +252614963396/+254722660727

13. Data Protection Impact Assessments (DPIA)

CESDO will conduct a Data Protection Impact Assessment (DPIA) before starting any new project or processing activity that poses a high risk to the rights and freedoms of individuals. The DPIA will assess the necessity, proportionality, and risks of the data processing activity.

14. Training and Awareness

CESDO will ensure that all employees and contractors receive regular training on data protection principles and this policy. Training will include:

- Awareness of data protection regulations.
- Proper handling and processing of personal data.
- Identifying and responding to potential data breaches.

15. Review and Updates

This policy will be reviewed and updated at least annually or when significant changes occur in the law or organizational processes. Any updates will be communicated to all staff and relevant stakeholders.

16. Non-Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract. Legal action may also be taken if non-compliance leads to data breaches or violations of data protection regulations.

Conclusion

CESDO takes its data protection obligations seriously and is committed to maintaining the highest standards of privacy and security for all personal data it processes. This policy ensures that CESDO's operations are in compliance with data protection laws and that individuals' rights are respected and protected.