

Data Privacy and Protection Policy

Women's Health and Action Research Centre (WHARC)

1. Purpose

This policy outlines WHARC's commitment to protecting the privacy, confidentiality, and security of personal data collected from staff, research participants, partners, and the public. WHARC ensures that all personal data are processed lawfully, fairly, and transparently in compliance with the Nigeria Data Protection Regulation (NDPR) and other applicable laws.

2. Scope

This policy applies to all personal data collected, stored, processed, or shared by WHARC in the course of its activities, including:

- Research projects and surveys
- Training and capacity-building programmes
- Conferences and events
- Administrative, donor, and partner records

It applies to all WHARC staff, consultants, interns, and third parties who handle personal data on behalf of the Centre.

3. Principles of Data Privacy

WHARC upholds the following principles in all data activities:

1. **Lawfulness, Fairness, and Transparency:** Data are collected and processed with consent and clear purpose.
2. **Purpose Limitation:** Data are used only for the specific, stated purpose.
3. **Data Minimization:** Only data necessary for the purpose are collected.
4. **Accuracy:** WHARC ensures data are accurate and up to date.
5. **Storage Limitation:** Personal data are retained only as long as necessary.
6. **Confidentiality and Security:** Data are safeguarded from unauthorized access, alteration, disclosure, or loss.

4. Lawful Basis for Data Collection

WHARC collects and processes personal data based on one or more of the following lawful bases:

- Consent of the individual
- Performance of a contract or agreement
- Compliance with legal obligations
- Protection of vital interests (e.g., in health-related research)
- Legitimate organizational interests

5. Rights of Data Subjects

Individuals whose personal data are held by WHARC have the right to:

- Access their data and request copies
- Request correction or deletion of inaccurate data
- Withdraw consent at any time (where applicable)
- Object to data processing in certain circumstances

6. Data Security and Confidentiality

- WHARC employs appropriate technical and organizational measures to protect data (e.g., password protection, encryption, restricted access).
- All staff and associates are required to maintain strict confidentiality regarding personal data.
- Physical records are stored in secured areas, and digital data are kept on password-protected systems with regular backups.

7. Data Sharing and Third Parties

- WHARC will not share personal data with third parties without lawful justification and, where necessary, the individual's consent.
- All third-party processors (e.g., research partners, funders) must comply with WHARC's data protection standards.

8. Data Retention and Disposal

- Personal data are retained only for as long as necessary to fulfill the purpose for which they were collected or as required by law.
- Data no longer required will be securely deleted, shredded, or anonymized.

9. Breach Reporting

Any suspected or actual data breach must be immediately reported to WHARC's Data Protection Officer (DPO).

WHARC will investigate and, where necessary, notify affected individuals and NITDA within the legally required timeframe.

10. Responsibilities

- Executive Director: Provides oversight for policy implementation.
- Data Protection Officer (DPO): Ensures compliance, manages data requests, and coordinates breach responses.
- All Staff and Affiliates: Must follow this policy and handle personal data responsibly.

11. Review and Updates

This policy will be reviewed annually or as required by changes in data protection laws or WHARC's operations.

Policy Approved By: Board of Trustees

Date: November 3, 2025