



Women's Health and Action Research Centre (WHARC)

Data Protection Policy

1. Introduction

The Women's Health and Action Research Centre (WHARC) is committed to protecting the privacy, confidentiality, and security of the personal and sensitive data it collects. This policy outlines WHARC's responsibilities and obligations to comply with applicable data protection laws and regulations.

2. Purpose

The purpose of this policy is to:

- Ensure the proper handling, protection, and use of personal and sensitive data.
- Establish a framework for compliance with national and international data protection laws, such as the **Nigeria Data Protection Regulation (NDPR)**.
- Foster trust among stakeholders, including employees, partners, donors, and beneficiaries.

3. Scope

This policy applies to:

- All employees, volunteers, interns, contractors, and partners of WHARC.
- Any data WHARC collects, processes, or stores, including personal data of beneficiaries, donors, research participants, and employees.

4. Definitions

- **Personal Data:** Any information that identifies or can identify an individual (e.g., name, contact information, ID numbers, medical history).
- **Data Subject:** Any individual whose personal data is collected or processed.
- **Processing:** Any operation performed on personal data, including collection, recording, storage, use, or deletion.
- **Data Controller:** WHARC, which determines the purpose and method of data processing.
- **Sensitive Data:** Data that includes health records, biometric data, financial information, and other confidential details.

5. Principles of Data Protection

WHARC adheres to the following principles:

1. **Lawfulness, Fairness, and Transparency:**
 - WHARC will collect data lawfully, fairly, and transparently. Data subjects will be informed about data usage.

2. **Purpose Limitation:**

- Data will be collected for specified, explicit, and legitimate purposes, and not processed further in a manner incompatible with those purposes.

3. **Data Minimization:**

- Only data that is necessary for the intended purpose will be collected and processed.

4. **Accuracy:**

- WHARC will ensure data is accurate and updated as needed. Data subjects may request corrections.

5. **Storage Limitation:**

- Personal data will not be kept longer than necessary for the purpose of processing.

6. **Integrity and Confidentiality:**

- Appropriate measures will be taken to secure data against unauthorized access, loss, or destruction.

7. **Accountability:**

- WHARC is responsible for demonstrating compliance with this policy and relevant laws.

6. Data Collection and Use

- WHARC collects personal data for specific purposes, such as:
 - Research and program delivery.
 - Employee management and payroll processing.
 - Communication with donors, stakeholders, and beneficiaries.
- Consent will be obtained from data subjects where required.
- Data collected will not be shared with third parties without explicit consent, except when legally obligated.

7. Data Security

WHARC will implement appropriate technical and organizational measures, including:

- **Encryption and Password Protection:** All digital data must be stored securely using encrypted systems.
- **Access Control:** Restrict access to personal data to authorized personnel only.
- **Data Backups:** Regular backups to prevent data loss.
- **Physical Security:** Ensure secure storage of hard copies in locked files and restricted office spaces.

8. Data Retention and Disposal

- Data will be retained only for more than 5 years
- At the end of its lifecycle, data will be securely deleted or destroyed to prevent unauthorized access.

9. Rights of Data Subjects

WHARC will ensure individuals can:

- Access their personal data.
- Correct inaccurate or incomplete data.
- Request deletion of their data (where applicable).
- Object to data processing for certain purposes.
- Withdraw consent at any time.

10. Data Breach Management

In the event of a data breach:

1. WHARC will assess the breach promptly.
2. Affected parties will be notified as required by law.
3. Steps will be taken to mitigate damage and prevent recurrence.

11. Roles and Responsibilities

- **Management:** Oversee policy implementation and compliance.
- **Employees:** Ensure data is processed in line with this policy.
- **Data Protection Officer (DPO):** Oversee compliance and serve as a point of contact for data protection inquiries.

12. Training and Awareness

WHARC will provide regular training for all staff to ensure awareness of data protection laws, risks, and responsibilities.

13. Compliance and Monitoring

- WHARC will periodically review this policy to ensure it remains current and compliant with legal requirements.
- Non-compliance may result in disciplinary action or legal consequences.

14. Review and Updates

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

Policy Approved By:



Dr. Wilson Imongan
ED. WHARC

