

Programs: - Financial Support in Emergencies, - Education in Emergencies, WASH & Environmental

Protection, - Health in Emergencies, - Livelihood and Agriculture, - Training and Youth Empowerment

Location: PO.BOX 540, BUEA. SOUTHWEST REGION CAMEROON

Registration Number:893G.37C84/VOLI/SAAJP/A3

Web-Address: www.hsfan.org

## HOPE SPRING FOR ALL NATIONS (HSFAN) DATA PROTECTION

#### **POLICY**

- **1. Introduction** Hope Spring for All Nations (HSFAN) upholds the privacy and confidentiality of information gathered, handled, and stored throughout our operations. This Data Protection Policy outlines the principles and practices we follow to ensure compliance with data protection laws and safeguard the rights and privacy of individuals in relation to partnerships and employees within HSFAN.
- **2. Scope** This policy applies to all employees, volunteers, contractors, partners, and any third parties processing personal data on behalf of HSFAN. It covers all personal data collected, processed, stored, and shared in relation to our operations, including beneficiary, donor, partner, and employee data.
- **3. Principles of Data Protection** HSFAN adheres to the following principles when processing personal data:
  - Lawfulness, Fairness, and Transparency: Data is processed legally, fairly, and transparently.
  - **Purpose Limitation:** Data is collected for specific, legitimate purposes and not further processed in a manner incompatible with those purposes.
  - **Data Minimization:** Only the necessary data for the intended purpose is collected and processed.
  - Accuracy: Personal data is kept accurate and up-to-date.
  - **Storage Limitation:** Data is retained only for as long as necessary.
  - **Integrity and Confidentiality:** Data is processed securely to prevent unauthorized access, loss, or destruction.
  - **Accountability:** HSFAN is responsible for ensuring compliance with data protection laws and principles.
- **4. Data Collection and Use** Personal data collected by HSFAN may include names, contact details, identification documents, financial details, and other relevant information necessary for our activities. The data is used for:
  - Program implementation and beneficiary support



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- Donor and partner relations
- Volunteer and employee management
- Compliance with legal and regulatory obligations
- **5. Data Accuracy and Updates** To ensure the accuracy of personal data collected, HSFAN:
  - Regularly reviews and updates records to maintain data accuracy.
  - Provides individuals with opportunities to update their information.
  - Implements verification processes before processing sensitive information.
  - Ensures data corrections are made promptly when errors are identified.
- **6. Data Storage and Security** HSFAN implements appropriate technical and organizational measures to safeguard personal data, including:
  - Secure digital and physical storage systems
  - Access controls and authorization restrictions
  - Encryption and secure communication channels
  - Regular data security assessments and audits
- **7. Data Sharing and Third Parties** HSFAN do not sell personal data. Data may be shared with trusted partners, service providers, regulatory bodies, and donors under strict confidentiality agreements and legal requirements. Any third party handling personal data on behalf of HSFAN must comply with our data protection standards. To ensure compliance, HSFAN:
  - Conducts due diligence on third parties before sharing data.
  - Includes data protection clauses in agreements with third parties.
  - Requires third parties to implement security measures consistent with HSFAN's policies.
  - Periodically reviews third-party compliance with data protection agreements.
  - Terminates relationships with third parties found in violation of data protection standards.
- **8. Rights of Data Subjects** Individuals whose data is processed by HSFAN have the following rights:
  - Right to access their personal data
  - Right to request rectification of inaccurate data
  - Right to request erasure of data under lawful conditions
  - Right to object to processing or request restrictions
  - Right to data portability
  - Right to complain to a data protection authority
  - Right to inquire about compliance measures taken by HSFAN



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- **9. Exercising Data Subject Rights** Individuals can exercise their rights by submitting a request through the designated HSFAN contact channels. Requests will be processed within a reasonable timeframe following applicable legal requirements. Individuals may:
  - Request access, correction, or deletion of their personal data.
  - Object to processing or request data portability.
  - Seek clarification on data protection measures taken by HSFAN.
  - Appeal decisions regarding data processing concerns.
- **10.** Criteria for Assessing Lawfulness of Data Requests HSFAN evaluates requests for data access or deletion based on the following criteria:
  - Whether the request is made by the data subject or a legally authorized representative.
  - Whether the request complies with legal obligations and regulatory requirements.
  - Whether deletion would conflict with contractual or legal retention obligations.
  - Whether the request poses any security or fraud risks.
- **11. Appeals Process for Denied Requests** If an individual's request regarding their personal data rights is denied, HSFAN provides an appeals process as follows:
  - The individual may submit a written appeal explaining the grounds for reconsideration.
  - The Data Protection Officer and a designated compliance team will review the appeal.
  - A response will be provided within 30 days, detailing the final decision and any further steps that can be taken.
  - If the appeal remains unresolved, the individual may escalate the matter to relevant regulatory authorities.
- **12.** Cross-Border Data Transfers In cases where personal data must be transferred across national borders, HSFAN ensures that:
  - The transfer complies with applicable data protection regulations.
  - Adequate safeguards, such as standard contractual clauses, are in place to protect personal data.
  - The recipient organization adheres to data protection standards equivalent to HSFAN's.
  - Data subjects are informed about the transfer and their rights regarding their data.
- 13. Data Breach Management In the event of a data breach, HSFAN will:
  - Conduct a thorough investigation to determine the cause and scope of the breach.
  - Assess potential risks and the impact on affected individuals.



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- Take immediate action to contain and mitigate further risks.
- Notify affected individuals and relevant authorities as required by law.
- Implement corrective measures to prevent future breaches.

# **14. Monitoring Employee Compliance** To ensure adherence to the data protection policy, HSFAN:

- Conducts regular audits and spot checks on data handling practices.
- Require employees to sign confidentiality agreements.
- Implements an internal compliance reporting mechanism.
- Conducts annual performance evaluations incorporating data protection compliance.
- **15.** Consequences of Policy Violations Any employee or third party found violating HSFAN's data protection policies will face disciplinary or legal action, which may include:
  - Formal warnings or retraining requirements for minor breaches.
  - Suspension or termination of employment for serious violations.
  - Termination of third-party contracts for non-compliance.
  - Legal action, including reporting to regulatory authorities, if violations harm data subjects or HSFAN.
- **16. Policy Review** This policy will be reviewed periodically and updated as necessary to reflect changes in legislation, operational requirements, and best practices.

Contact Information: For any inquiries regarding this policy, please get in touch with Hope Spring for All Nations (HSFAN) at info@hsfan.org





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