



**REDESOS POLICY ON THE PROTECTION OF
PERSONAL DATA OF PERSONS OF CONCERN TO
UNHCR AND REDESOS STAFF**

(Adopted from Data protection policy-UNHCR)

1.1 Purpose:

This policy lays down the rules and principles relating to the processing of personal data of persons of concern to UNHCR and REDESO Staff.

1.2 Rationale

In processing personal data there are inherent risks such as accidental or unauthorized loss or disclosure. Persons of concern of refugee are vulnerable people, they need protection, and the nature of their personal data is generally sensitive and, therefore, requires careful handling in line with this policy.

For REDESO, partner of UNHCR the proper protection of the personal data of personal data of persons of concern is therefore of particular importance and REDESO has a responsibility to process it in a way that respects data protection principles (Data protection policy, UNHCR, 2015).

1.3 Scope

This policy applies to all personal data held by REDESO in relation to persons of concern to UNHCR.

This policy applies whether processing takes place, within REDESO Officer, between different REDESO offices in the same or more a one branch office, or whether personal data is transferred to third parties. The policy continues to apply even after refugees are no longer of concern to UNHCR/REDESO.

2.1 Basic Principles of personal Data Processing

REDESO personnel need to respect and apply the following basic principles

When processing personal data:

1. Legitimate and fair processing
2. Purpose specification
3. Necessity and proportionality
4. Accuracy
5. Respect for the rights of the data subject.
6. Confidentiality
7. Security
8. Accountability and Supervision.

3.1 Information

When collecting personal data from a data subject, REDESO should inform the data subject of the following in writing or orally, and in a manner and language that is understandable to the data subject.

3.2 Access

Upon request the data subject may receive from REDESO- the personal data.

3.3 Correction and Deletion:

The data subject may request the correction or deletion of personal data that is inaccurate incomplete, unnecessary or excessive.

Where a data subject requests the correction or deletion of his or her personal data. REDESO is to request proof relating to the inaccuracy or incompleteness.

3.4 Objection:

A data subject may object to the processions of his or her personal data where there are legitimate grounds related to his or her specific personal situation. If the objection is justified REDESO should no longer process the personal data concerned and request advice from UNHCR.

4.1 Confidentiality of personal data

Personal data is by definition classified as confidential. The confidentiality of personal data must be respected by REDESO staff when processing personal data at all times.

In order to ensure and respect confidentiality, personal data must be filed and stored in a way that it is accessible only to authorized staff and transferred only through the use of protected means of communication.

4.2 Security of Personal Data:

REDESO has to protect personal data against the risk of accidental or unlawfully/illegitimate destruction, loss alteration, unauthorized disclosure of, or access to personal data.

REDESO has to maintain physical Security of premises, portable equipment, Individual case files and records.

Maintaining computer and information technology (IT) security, for example, access control (e.g. passwords), user control, Storage control, input control, and communication.

4.3 Ensuring accuracy of personal data

REDES0 may correct or delete personal data held on its systems that is inaccurate, incomplete, unnecessary or excessive.

REDES0 should update personal data records when necessary and periodically verify them.

4.4 Data Controlling

Staff responsible for recording and keeping personal data should ensure that personal data are kept in safe storage.

4.5 Retention:

All individual case files, whether open or closed are considered permanent records, and must therefore be permanently retained in with this policy.

5.1 Data Processing by REDES0

REDES0 is responsible in personal data collection and processing. REDES0 is expected to respect and protect personal data contained in this policy.

5.2 Verification:

Processing of personal data by REDES0 will satisfy the standard and basic principle of this policy. REDES0 welcome partner (UNHCR) to verify personal data where necessary.

5.3 Partnership Agreements

REDES0 shall comply with this policy through an undertaking as part of the signing of partnership agreements.

REDES0 shall only process personal data of population of concern in order to implement the project.

5.4 Data Controller and data protection Focal point:

Data controlling and protection is responsible of all REDES0 staff in every department and overseeing the processing of personal data.

Finance and Administration Manager shall control all personal data (staff) and bears the main responsibility for compliance with the policy.

6.0 APPROVAL OF DATA PROTECTION POLICY

Approved by:

Chairman of the Board

Secretary of the Board

Name:.....

Name:.....

Signature:.....

Signature:.....

Date:.....

Date:.....