

CENTRE FOR INFORMATION TECHNOLOGY AND DEVELOPMENT (CITAD)



Data Protection Policy

Introduction

This Data Protection Policy is designed by the Centre for Information Technology and Development (CITAD) to protect and ensure the accountability in collecting and sharing of its staff, associates and programmes beneficiaries' data both in hard and soft copy.

The policy outlines the principles, guidelines, and procedures to be followed by all employees, contractors, and volunteers of the Centre for Information Technology and Development (CITAD) (hereinafter referred to as "CITAD") when handling, storing, processing, and transferring personal and sensitive data. This policy aims to ensure the confidentiality, integrity, and availability of data while complying with applicable data protection laws and regulations.

Policy brief & purpose:

CITAD's Data Protection Policy refers to our commitment to treat the information of employees, partners, stakeholders, and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, use, store, handle data fairly & objectively, transparently, and with respect for individual rights. The organization deserves the right to change/review any of part of the policy as its prerogative right.

Scope

This policy covers all parties (employees, job candidates, volunteers, partners, sponsors, contractors, friends of CITAD, sub-grantees, trainees, etc.) who provide any amount of information to the organization.

The policy applies to all data collected, stored, processed, or transferred by CITAD, regardless of the medium or format used, including but not limited to electronic, paper, verbal, and visual data. It covers the personal data of employees, clients, partners,

donors, sub-grantees, beneficiaries, and any other individuals whose data CITAD may handle.

Who is covered under the Data Protection Policy?

Employees of CITAD and its partners must follow this policy. Contractors, consultants, partners, and other external entities are also covered. Generally, the policy includes anyone we collaborate with or who acts on our behalf and may need occasional access to organization's data for reference.

Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, financial data, hard or electronic publications, etc.

CITAD collects this information in a transparent way and only with the full cooperation and knowledge of interested parties.

The information available to us will be guided by the following principles:

a. **Lawfulness, Fairness, and Transparency:** Data will be collected and processed lawfully, fairly, and transparently, with individuals being informed about the purpose, legal basis, and processing methods.

b. **Purpose Limitation:** Data will be collected for specified, explicit, and legitimate purposes, and will not be further processed in a manner incompatible with those purposes.

c. **Data Minimization:** Only necessary and relevant data will be collected and processed to fulfill the stated purposes, avoiding excessive data collection.

d. **Accuracy:** Reasonable steps will be taken to ensure the accuracy and currency of data, and individuals will be given the opportunity to rectify any inaccuracies.

e. **Storage Limitation:** Data will be retained only for as long as necessary to fulfill the purposes for which it was collected, taking into account legal, contractual, and operational requirements.

f. **Integrity and Confidentiality:** Appropriate technical and organizational measures will be implemented to safeguard data against unauthorized or unlawful processing, accidental loss, destruction, or damage. The confidentiality of the data will be maintained.

g. **Accountability:** CITAD will be responsible for demonstrating compliance with data protection laws, establishing mechanisms for handling data protection inquiries, complaints, and breaches.

h. **Non-transferable:** CITAD's data must on no account be transferred to another party without the consent of the organization. Access to data will be granted only on a need-to-know basis

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the organization within its legal and moral boundaries
- Protected against any unauthorized or illegal access by both internal or external parties

Our data will not be:

- Communicated informally
- Stored for more than a specified period of time
- Transferred to organizations, government agencies of states, local governments or countries that do not have adequate data protection policies
- Published or distributed to any party other than the ones agreed upon by the data's owner. However, laws agencies such as the DSS, NPF, EFCC and other enforcement agencies are exempted based on (legitimate requests)

In addition to ways of handling the data, CITAD has direct obligations towards the people to whom the data belongs. Specifically, we must

- Seek for people's consent before using their data
- Let people know which of their data is collected
 - Inform people about how we'll process their data
 - Inform people about who has access to their information
 - Have provisions in cases of lost, corrupted or compromised data
 - Allow people to request that we modify, erase, reduce or correct data contained in our databases

Actions

To exercise data protection, we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization, etc.)

Responsibilities

- **Data Protection Officer:** CITAD will designate a Data Protection Officer (DPO) responsible for overseeing data protection efforts, monitoring compliance, providing advice, proposing need for review or change on any part of the policy as and when due & to serve as a point of contact for data subjects with regulatory authorities.
- **Employees, Contractors, and Volunteers:** All individuals handling personal or sensitive data are responsible for adhering to this policy, maintaining confidentiality, and reporting any potential or actual data breaches to the DPO or designated personnel.

Data Collection and Processing

- **Consent:** Personal data will be collected with the consent of the individuals, except when processing is necessary for the performance of a contract, compliance with legal obligations, protection of vital interests, public interest, or legitimate interests pursued by CITAD.
- **Data Security:** Appropriate technical and organizational measures will be implemented to protect data from unauthorized access, disclosure, alteration, or destruction. This includes measures such as access controls, encryption, secure storage, regular data backups, and staff training.
- **Data Transfers:** Personal data transfers to third parties or international jurisdictions will be subject to appropriate safeguards, including data processing agreements, standard contractual clauses, or other legal mechanisms ensuring an adequate level of protection.

Data Subject Rights

- **Access and Rectification:** Data subjects have the right to access their personal data, rectify inaccuracies, and update information when necessary.
- **Erasure and Restriction:** Data subjects have the right to request the erasure or restriction of their personal data in certain circumstances, as provided by applicable data protection laws.
- **Objection and Withdrawal:** Data subjects have the right to object to the processing of their personal data and withdraw their consent at any time, where consent is the legal basis for processing.

Data Breach Management

- **Reporting:** Any actual or suspected data breaches must be reported immediately to the DPO or designated personnel, who will initiate an investigation and take appropriate measures to contain, assess, and mitigate the impact of the breach.
- **Notification:** Affected data subjects, regulatory authorities, and other relevant stakeholders will be notified as required by applicable laws in the event of a data breach that poses a risk to their rights and freedoms.

Training and Awareness

- Regular training and awareness programs will be conducted to educate staff about their responsibilities under this policy, applicable data protection laws, and best practices for data protection and privacy in order to ensure the safety of data collected and used. The training will enhance the skills of staff and increase their level of awareness on data and its usage. Not only employees, contractors and volunteers will also be involved in the training to ensure their understanding of data protection principles, policies, procedures, and their roles in safeguarding data is broadened.

Policy Compliance

- Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, as well as legal consequences if a breach of applicable data protection laws occurs.

Review and Revision

- This policy will be reviewed periodically to ensure its effectiveness, accuracy, and compliance with evolving legal and regulatory requirements. Any updates or revisions will be communicated to all relevant stakeholders.

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action. By adhering to CITAD's Data Protection Policy, CITAD aims to establish and maintain a culture of data protection and privacy, ensuring the trust and confidence of individuals whose data it handles.

NB: This policy is the sole property of CITAD

Our data protection provisions is available on our website (www.citad.org)