

EFSCRJ Privacy Policy

1. Purpose

This Privacy Policy outlines how the Edward Francis Small Centre for Rights and Justice (EFSCRJ) collects, uses, stores, shares, and protects personal data in line with its commitment to privacy, dignity, and the rights of individuals. It applies to all personal data obtained through operations, partnerships, projects, and digital platforms. The Privacy Policy is consistent with our values of transparency, accountability, and human rights protection

2. Scope

This policy applies to:

- Staff, board members, volunteers, consultants, and interns
 - Donors, partners, beneficiaries, and the general public
 - All personal data collected by EFSCRJ through websites, forms, communications, events, and field activities
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3. Definition of Personal Data

Personal data refers to any information that can identify a person, directly or indirectly. This includes names, contact details, identification numbers, photographs, health data, opinions, or digital identifiers such as IP addresses.

4. Data Collection

EFSCRJ collects personal data for purposes including:

- Program delivery and service provision
- Research, advocacy, and campaign activities
- Training, workshops, and events
- Human resource management
- Communication and fundraising

Data is collected lawfully, fairly, and transparently, with consent wherever required.

5. Legal Basis for Processing

EFSCRJ processes personal data based on:

- The informed consent of the data subject
 - Contractual obligations, employment or funding agreements
 - Legal compliance with national and international human rights standards
 - Legitimate interest in fulfilling its mission
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6. Data Use

Personal data shall only be used for the purpose for which it was collected. EFSCRJ shall not:

- Sell, rent, or trade personal information
 - Share data without permission, unless legally required or justified for protection or law enforcement purposes
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7. Data Sharing and Third Parties

EFSCRJ may share personal data with:

- Donors or partners under binding agreements that include confidentiality and data protection clauses
- Statutory authorities, only where legally required
- Service providers (e.g., IT or logistics firms) acting on behalf of EFSCRJ under secure and ethical conditions

8. Data Retention

Personal data shall be retained only as long as necessary for the purpose collected, or as required by law or donor policies:

- Staff records: 7 years after termination
- Donor and financial records: 7 years
- Beneficiary data: Duration of project plus 2 years
- Research data: Per project terms, anonymized where possible

9. Data Security

EFSCRJ commits to:

- Storing data securely using password-protected systems and locked physical files
- Restricting access to authorized personnel only
- Regularly updating digital and physical security protocols
- Using encryption and anonymization where appropriate

10. Rights of Data Subjects

Every individual whose data is collected by EFSCRJ has the right to:

- Access their personal data
- Request correction or deletion
- Withdraw consent at any time
- Object to certain uses of their data
- File a complaint with a supervisory authority if rights are violated

Requests can be made by contacting the Data Protection Officer (DPO) at the Centre.

11. Children's Data

EFSCRJ recognizes special obligations in handling children's data. Personal data of individuals under 18 will only be collected with explicit consent from a parent or legal guardian and handled in line with the Child Protection Policy.

12. Data Breach Response

In the event of a data breach, EFSCRJ will:

- Contain the breach immediately
 - Assess the risk and scope of impact
 - Notify affected individuals and relevant authorities, if required
 - Document and review the incident to prevent recurrence
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13. Digital Privacy

EFSCRJ's website may use cookies to enhance user experience. Website users may choose to disable cookies through browser settings. EFSCRJ will not track or collect personally identifiable information without consent.

14. Policy Review

This Privacy Policy shall be reviewed every two years, or earlier in response to changes in data protection laws, donor requirements, or organizational practice.

15. Contact

Data Protection Officer

Edward Francis Small Centre for Rights and Justice

Email: [To be assigned]

Phone: [To be assigned]
