



HEALTH POVERTY ACTION

Programme Participants' privacy notice

This notice applies to current and former Programme Participants

Types of data we process

We hold many types of data about you, these can include:

- Your personal details including your name, address, date of birth, email address, phone numbers
- ID Card number
- Geo-location data
- Gender
- Nationality
- Ethnic origin
- Clan
- Race
- Language
- Religion
- Marital status
- Hardship level
- Source of income
- Education level
- Health condition (including HIV/AIDS and FGC/M status)
- Type of mental or physical disability if any

How we collect your data

We collect data about you in a variety of ways, mainly through questionnaires and surveys administered by HPA field officers and M&E officers. We collect further information directly from you at evaluation points through Focus Groups Discussions and Key Informant Interviews or during activities' implementation.

We may collect data about you from third parties, such as local authorities; communities and sector/district offices.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- In order to carry out legally required duties
- In order to comply with contract obligations
- If you have if you have explicitly given us consent do so
- To protect your interests
- In order for us to carry out our legitimate interests

All of the processing carried out by us falls into one of the permitted reasons. For example, we need to collect your personal data in order to:

- Make sure that the most marginalised members of the community are involved in our project activities
- Make sure that the project participants are involved in monitoring activities.

We also collect data so that we can carry out activities which are in the legitimate interests of the organisation. We have set these out below:

- dealing with legal claims made against us
- providing accurate beneficiary numbers to donors

Special categories of data

Special categories of data are those relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

Where we hold it, we will use your special category data:

- for the purposes of monitoring the impact of our activities

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where you choose to withdraw consent.

If you do not provide your data to us

If you do not provide your data to us, we may be unable to provide the adequate service to you and you might not be involved into programme monitoring activities.

Sharing your data

Your data will be shared with colleagues within the organisation where it is necessary for them to undertake their duties. This includes, for example, Programme Managers and M&E Officers to elaborate the data.

We share your data with third parties in order to:

- complete relevant mandates and documentation, for example in relation to M&E activities
- arrange for reimbursement of expenses where necessary

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

Personal data is kept in secure IT systems and/or in locked cabinets.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for. In most cases this is up to 6 years after the end of the project you have been involved into, but can be longer depending on specific donor contractual requirements.

Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.