



Future Association For Development and Environment

جمعية المستقبل للتنمية والبيئة

Future Association for Development and  
Environment (FADE)

FADE-DATA PROTECTION POLICY

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## Introduction

FADE is committed to protecting the privacy of personal data of all individuals we interact with, including beneficiaries, employees, volunteers, donors, and partners. We recognize the importance and sensitivity of this data, especially in the humanitarian context where beneficiary data may be highly sensitive. This policy aims to define the procedures and standards that ensure the collection, storage, processing, and sharing of data in a secure, ethical, and lawful manner, in accordance with international best practices and relevant local laws, to enhance trust and protect individuals' rights.

FADE's commitments are based on four core values:

- **Responsibility:** We strive to provide humanitarian assistance efficiently and with integrity, making the best use of resources entrusted to us.
- **Impact:** We are committed to creating a sustainable and effective impact in the lives of individuals and communities we serve.
- **Initiative:** We work with an innovative and proactive mindset that seeks to create shared value and overcome challenges.
- **Inspiration:** We aim to inspire those around us through our vision, values, practical approach, responsible choices, impactful practices, and continuous advocacy for humanitarian causes.

## Policy Statement

1. FADE places the utmost importance on privacy protection, considering respect for privacy and safeguarding personal data as fundamental pillars for building trust. These values represent a core commitment at FADE, manifested by respecting fundamental rights and freedoms, and adopting a transparent and responsible approach in data handling.
2. This policy aims to clarify the fundamental principles FADE adopts to protect personal data and to apply them across all organizational activities and intervention areas.
3. This policy serves as a guiding framework for FADE staff and must be read and applied in conjunction with the following internal policies:
  - FADE Code of Conduct;
  - FADE Child Protection Policy;
  - FADE Prevention of Exploitation, Abuse, and Sexual Harassment Policy;
  - FADE Conflict of Interest Policy;
  - FADE Complaints Policy;
  - FADE Anti-Fraud, Bribery, and Corruption Policy;
  - FADE Counter-Terrorism and Anti-Money Laundering Policy;
  - FADE Environmental and Social Protection Policy;
  - FADE Gender Policy;
  - FADE approved organizational procedures and manuals, such as: Financial Procedures Manual, Logistics Manual, Human Resources and Administration Manual, and Safety and Security Manual;

- Procedural guides including Transparency and Compliance Manual, Evaluation Manual, Monitoring and Evaluation Manual, Project Management Manual, and Project Development Manual;
- The Six Core Principles of the Inter-Agency Standing Committee (IASC) related to Sexual Exploitation and Abuse;
- Organizational charters such as FADE's Information Systems Usage Charter;
- The Code of Conduct of the International Red Cross and Red Crescent Movement and non-governmental organizations involved in disaster relief, of which FADE is a signatory;
- The Six Core Principles of the IASC regarding Prevention of Sexual Exploitation and Abuse;
- Data-related agreements, including data processing agreements, data sharing agreements, and data retention notices.

## Interpretation and Application

### Article 1 – Scope of Application

This policy applies to all types of personal data (digital and physical) collected, processed, stored, or shared by FADE. This includes:

- All employees, volunteers, consultants, and contractors who handle the data.
- All departments, including programs, finance, human resources, logistics, and MEAL.
- Implementing partners who must comply with similar data protection standards.
- All systems, applications, and files containing personal data.

### Article 2 – Definitions

For the purposes of this policy, the following terms have the meanings below:

1. **Data Recipient:** Any natural or legal person, public authority, department, or body that receives personal data, whether considered a third party or not, as defined by the General Data Protection Regulation (GDPR).
2. **Data Protection Officer (DPO):** The person appointed, according to GDPR provisions, to:
  - Provide information and advice to FADE and its staff regarding their obligations related to personal data protection;
  - Monitor FADE's compliance with data protection regulations;
  - Support the organization during data protection impact assessments;
  - Coordinate and cooperate with supervisory authorities.
3. **Personal Data:** Defined under the GDPR as any information relating to an identified or identifiable natural person, directly or indirectly, including name, ID number, location data, electronic identifier, or other elements related to physical, physiological, genetic, mental, economic, cultural, or social identity.
4. **FADE Employees:** Includes all workers of FADE, sister organizations, or network members, including trainees working with these entities.

5. **Data Subject:** The natural person who can be identified directly or indirectly and whose personal data is processed by FADE.
6. **Applicable Law:** All applicable legislation related to privacy protection in the context of personal data processing, including French Law No. 78-17 of January 6, 1978, and the European Regulation 2016/679 (GDPR) dated April 27, 2016.
7. **Third Party:** Any natural or legal person, public authority, administration, or other body, who is neither the subject of the processing nor the controller or processor, but may be granted access to data under direct supervision.
8. **Processing:** Any operation or set of operations performed on personal data, whether or not by automated means, including collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, transmission, dissemination, alignment, restriction, erasure, or destruction.

## Article 3 – Information and Policy Commitment

1. This policy is adopted under FADE’s authority, and all staff and entities referred to in Article 1 must fully comply with and regularly review it, including any updates. Guidance or consultation should be sought from direct managers or the DPO when needed.
2. All FADE employees and related entities acknowledge full knowledge of this policy and commit to its implementation.
3. FADE staff and related entities bear responsibility for ensuring actual compliance. Disciplinary measures shall be taken in case of violations according to institutional regulations.
4. FADE periodically reviews this policy to ensure alignment with laws and relevant developments.

## General Principles Related to Data Protection

### Article 4 – Commitment to the Policy

1. All FADE employees shall adhere fully to the principles of personal data processing at all times during their duties and responsibilities.
2. When processing new data, the following principles must be observed.

### Article 5 – Lawfulness of Processing

1. All personal data processing must comply with applicable law. FADE employees must perform their tasks according to relevant legal obligations.
2. At the start of any new data processing, employees must strictly adhere to the principles below to ensure full policy compliance.

### Article 6 – Purpose of Processing

1. Processing purposes must be defined in advance, clear, legitimate, and consistent with FADE’s tasks.
2. Personal data must not be used in any manner incompatible with the specified and authorized purposes of each processing operation.

## Article 7 – Data Minimization and Accuracy

1. Predefined purposes allow assessing the adequacy of collected data, so collection and processing must be limited to what is necessary to achieve those purposes.
2. FADE commits to processing accurate, complete, and up-to-date personal data, and reserves the right to verify data validity with data subjects when necessary.

## Article 8 – Data Retention

1. The retention period of personal data must be appropriate to the processing purpose and comply with applicable laws.
2. Personal data must not be retained longer than necessary. In cases of doubt, refer to FADE's personal data retention policy.
3. FADE retains personal data only as long as legally required.
4. For inquiries regarding data retention, contact the Data Protection Officer at: [dpo@FADE.org](mailto:dpo@FADE.org).

## Article 9 – Transfer of Personal Data

1. FADE has established strict procedures for transferring personal data outside the European Union. FADE staff responsible for data protection must ensure compliance with these procedures, especially when contracting with suppliers.
2. Data subjects must be clearly informed of any data transfer to countries outside the EU, and such notification must be documented officially. FADE staff must ensure this information reaches data subjects correctly and completely.

## Article 10 – Data Protection Officer (DPO)

1. FADE has appointed a Data Protection Officer since 2018, who operates independently across all organizational entities to ensure data protection.
2. The DPO acts as a dedicated contact point responsible for enforcing data protection rules and serves as a liaison with the French data protection authority (CNIL) and other stakeholders.
3. The DPO can be contacted via email: [dpo@FADE.org](mailto:dpo@FADE.org).

## Principles Related to Data Subjects' Information and Rights

### Article 11 – Information to Data Subjects

1. FADE commits to providing clear, comprehensive, accessible, and understandable information to data subjects regarding the processing of their personal data.
2. Each data subject must be informed of:
  - The identity of the data controller and their representative, if any;
  - Contact details of FADE's Data Protection Officer;

- The purpose of processing;
  - Data recipients or categories thereof;
  - The rights of data subjects concerning the processing of their data as described in Article 12;
  - Existence of automated data processing, consent requests if required, and right to request human intervention;
  - Potential data cross-linking to improve FADE's task quality and effectiveness;
  - Any transfer of data outside the EU.
3. FADE has prepared specific information notices for certain categories to ensure this commitment, and must ensure they are delivered to the appropriate groups.

## Article 12 – Rights of Data Subjects and Procedures for Exercising Them

- FADE commits to taking all necessary technical and organizational measures to enable data subjects to exercise the following rights:
    - **Right of Access:** The right to request access to their personal data held by the organization, and the right to correct inaccurate data;
    - **Right to Erasure:** The right to have their data deleted;
    - **Right to Restrict Processing:** The right to limit the processing of their data;
    - **Right to Data Portability:** The right to request the transfer of their data to another party;
    - **Right to Object:** The right to object to the processing of their personal data under certain conditions;
    - **Right to Posthumous Directives:** The right to specify instructions after death regarding the use of their data;
    - **Right to Know:** The right to know the purpose of data collection and how it is used;
    - **Right to Rectification:** The right to request correction of inaccurate or incomplete data.
2. Data subjects may exercise these rights at any time by submitting a formal request via email: [dpo@FADE.org](mailto:dpo@FADE.org).
  3. FADE reserves the right to verify the identity of the requester.
  4. Data subjects have the right to file a complaint with the relevant supervisory authority.
  5. FADE commits to responding to such requests within one month from the date of receipt.

## Article 13 – Data Protection Procedures

### A. Data Collection:

- **Minimum Data:** Collect only the data necessary and relevant for the specified purpose.

- **Informed Consent:** Obtain clear and informed consent from the data subject before collecting and processing their data, especially sensitive data. The purpose, usage, and retention period must be explained.
- **Purpose Transparency:** Clearly inform the data subject of the purpose for data collection.
- **Avoid Duplication:** Ensure the same data is not repeatedly collected from beneficiaries without need.

## **B. Data Storage:**

- **Restricted Access:** Limit access to personal data only to employees who need it to perform their duties ("need to know" principle).
- **Secure Storage:**
  - For paper files: store in locked cabinets or secure rooms with controlled access.
  - For digital files: store on secure servers or encrypted cloud systems, using strong, regularly changed passwords.
  - Backups: maintain regular backups to prevent data loss.
- **Encryption:** Use encryption for sensitive data during storage or transmission.

## **C. Data Processing and Use:**

- **Limited Purpose:** Use data only for the purposes for which it was collected and approved.
- **Training:** Train all employees handling data on data protection policies and procedures.
- **Minimization / Anonymization:** Where possible, minimize data volume or anonymize it to reduce risks.

## **D. Data Sharing:**

- **No Sharing Without Need:** Do not share personal data with third parties unless there is a legal basis, explicit consent, or it is necessary to protect life or safety.
- **Data Sharing Agreements:** When sharing data with partners or donors, formal agreements must clearly specify terms of sharing and data protection.
- **Consent for Images/Stories:** Obtain explicit written consent from beneficiaries (or guardians for children) before using their photos or stories for promotional or fundraising purposes, clarifying how they will be used.

## **E. Data Disposal:**

- **Limited Retention:** Retain personal data only for as long as necessary to fulfill the purpose or comply with legal and donor requirements.
- **Secure Deletion:** Safely dispose of personal data when retention ends (e.g., shredding paper files, securely deleting digital files so they cannot be recovered).



## 5.7 Data Breach Incidents

- Immediate Reporting: Any data breach (unauthorized access, loss, damage) must be reported immediately to the Data Protection Officer.
- Investigation and Response: The incident will be promptly investigated, measures taken to contain the breach, minimize damage, and notify affected parties and authorities if legally or practically required.

## 5.8 Data Protection Officer (DPO)

The organization will appoint a Data Protection Officer (this role may be combined with IT Manager or Compliance Officer duties) to serve as the main contact for data protection matters, oversee compliance with this policy, and provide training and advice.

## 5.9 Review and Audit

- This policy will be reviewed regularly (at least annually) or when laws, regulations, or data processing technologies change, to ensure ongoing effectiveness and relevance.
- Data protection activities will be subject to regular internal and external audits.

# Principles Related to Confidentiality and Security

## Article 13 – Confidentiality

1. Respecting data confidentiality, especially when using electronic communication means, is a fundamental requirement at FADE.
2. Protecting FADE's interests requires full confidentiality and continuous caution regarding data accessed during professional work, whether social, legal, financial, commercial, scientific, technical, economic, or industrial.
3. Confidentiality commitment includes:
  - Preventing unauthorized parties from accessing information;
  - Not using information for personal purposes;
  - Using information only for predetermined purposes;
  - Respecting FADE's professional ethics and confidentiality rules.
4. Transfer of confidential data is only allowed under the following conditions:
  - Explicit permission from the issuing entity;
  - Identification of an authorized data recipient;
  - Following secure procedures;
  - Labeling the data as "CONFIDENTIAL."
5. Encryption is only permitted in cases explicitly authorized by policy.
6. FADE requires all contractors receiving data to provide adequate guarantees to protect data confidentiality.

## Article 14 – Security

1. FADE commits, within its available capabilities, to taking all necessary measures to maintain the security of personal data, especially to prevent its alteration, destruction, or unauthorized disclosure.
2. FADE requires contractors who receive data to provide appropriate guarantees to ensure data security.
3. Access to information is restricted to authorized individuals only, granted according to the principles of “least privilege” and “need to know.”
4. FADE has established an Information Systems policy that all employees and related parties are required to respect.

## Policy Amendment

### Article 15 – Policy Amendment

1. This policy is subject to periodic reviews considering legislative and regulatory changes, as well as any changes in FADE’s structure or operational procedures.
2. FADE commits to informing all relevant parties of any amendments made to the policy, updating the policy date accordingly.
3. If an amendment materially affects the nature of data processing or the rights of data subjects, FADE commits to notifying them immediately to enable them to exercise their rights, such as the right to object.
4. FADE has prepared an Information Systems Charter, which all employees and relevant parties are obliged to adhere to.

## Policy Implementation

### Article 16 – Policy Effective Date

1. This policy comes into effect immediately upon approval by FADE’s Board of Directors on March 17, 2023.

### Article 17 – Policy Commitment

1. All FADE employees and other entities mentioned in Article 1 sign an acceptance form and/or include it within their employment contract to confirm their commitment to its principles and provisions.

