

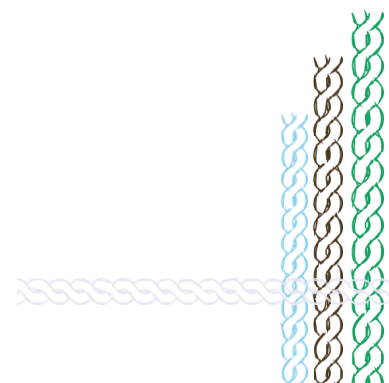
Data Protection Policy

Policy No: 005/2017

ABSTRACT

At eBASE Africa we seek to improve livelihoods through the use of innovation and best practices for underserved populations. We aspire to do this in an environment the data of human subjects will be secure and not used for ulterior motives

eBASE Africa



| | |
|---------------------|----------------------------------|
| Person Responsible | BARRISTER MARYANNE ZITHEM |
| Register of Systems | POLICIES AND PROCEDURES |

Table of Contents

Table of Contents 1

1. Data protection principles 2

2. General provisions 2

3. Lawful, fair and transparent processing 2

4. Organisation (eBASE Africa) 2

5. Data minimization 3

6. Accuracy 3

7. Archiving/Removal 3

8. Security 3

9. Breach 3



1. Data protection principles

eBASE Africa is committed to processing individual data collected for a specific purpose in a lawful, fair and transparent manner.

Given the fact that Cameroon does not have any specific Data Protection legislation, eBASE Africa requires that personal data shall:

- a. Only be accessed by staff of eBASE Africa for confidentiality purposes
- b. Where and when necessary, ensure that personal data are kept up to date and inaccurate data be rectified.
- c. Ensure that the processing of individual data is limited to the purpose for which it was collected.
- d. Ensure that the individual data is stored in a form which permits identification of data subjects for no longer than necessary. If personal data is to be kept for longer periods, the information will be used solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
- e. Individual data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized processing using appropriate technical or organizational measures

2. General provisions

- a. This policy is applicable to all personal data processed by eBASE Africa
- b. The Person Responsible shall take responsibility for eBASE Africa ongoing compliance with this policy.
- c. This policy shall be reviewed at least once every year.

3. Lawful, fair and transparent processing

- a. To ensure lawful, fair and transparent processing of data, eBASE Africa shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals who have their data at eBASE Africa have the right to access their personal data and such requests shall be dealt with in a timely manner by eBASE Africa.

4. Organisation (eBASE Africa)

- a. All data processed by eBASE Africa must be done based on consent from the individual of guardian, contract, critical and legitimate interests which are all lawful bases
- b. eBASE Africa shall note the appropriate lawful basis in the Register of Systems.



- c. There will be a consent form that shall be kept with personal data in cases where consent was used as the lawful basis.
- d. Individuals will clearly be given an option of revoking their consent and systems will be put in place to facilitate the process by eBASE Africa.

5. Data minimization

- a. eBASE Africa shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. eBASE Africa shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving/Removal

- a. To ensure that personal data is kept for no longer than necessary, eBASE Africa shall put in place an archiving policy for each area in which personal data is processed and this process shall be reviewed annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. eBASE Africa shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. All individual data shall be available only to eBASE Africa staff who need access to the data and appropriate security measures will be imposed to avoid unauthorized sharing of information.
- c. Deletion of personal data will be done in a way that it can never be recovered
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

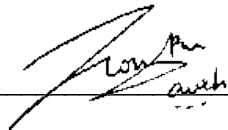
In the event of a breach of security leading to unauthorized disclosure of or access to personal data, accidental or unlawful destruction, loss or alteration, eBASE Africa shall promptly assess the risk to people's rights and freedoms take appropriate steps to resolve the problem.



This policy was adopted by eBASE Africa on 3rd April 2017

Signed on behalf of the Board of Trustees by:

Signature _____



DR PATRICK MBAH OKWEN

The policy has been reviewed by the Board of Trustees on:

Date **03.04.2017**

