

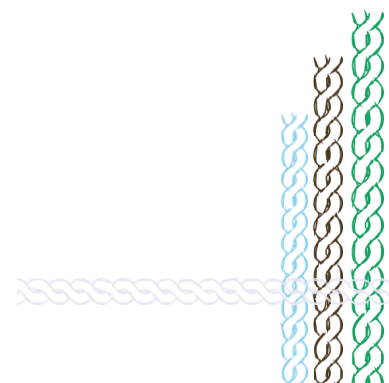
Privacy Policy

Policy No: 006/2017

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 where all sensitive information relevant to our organisation and partners are guarded with confidentiality.

eBASE Africa



Person Responsible	FR BERNADINE NSOM, BOARD LIAISON FOR ETHICS
Register of Systems	POLICIES AND PROCEDURES

Table of Contents

Table of Contents.....	1
Introduction	2
Purposes.....	2
Aims	2
Responsibilities	2
Processes.....	3
Collection	3
Use and Disclosure.....	3
Storage eBASE Africa.....	4
Destruction and de-identification eBASE Africa	4
Data Quality	4
Data Security and Retention	5
Openness	5
Access and Correction.....	5
Anonymity.....	5
Making information available to other organisations	5
Related Documents.....	5
Confidentiality Agreement.....	10



Introduction

The Board of eBASE Africa is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person. These persons may be staff (including volunteers, interns, post-docs, full-time and part-time), partners, clients, research subjects, trainees and any individual whose personal information is entrusted to eBASE Africa.

The privacy officer for eBASE Africa is Fr Bernadine Nsom, Board Liaison for ethics.

Purposes

The purpose of this eBASE Africa confidentiality policy is to provide a framework for eBASE Africa in dealing with privacy considerations.

Aims

eBASE Africa collects and administers a range of personal information for the purposes of research, identification of clients, partnerships and collaboration. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

eBASE Africa recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with penal code sections 299(1)(2), 3000(1); with exception during police investigation 300(2) and international convention on civil and political rights section 17.

eBASE Africa is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

eBASE Africa will

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Responsibilities

eBASE Africa's Board is responsible for developing, adopting and reviewing this policy.

eBASE Africa's Team Lead is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

All employees are responsible for observing privacy procedures in their workplace.



Processes

Collection

eBASE Africa will:

- 🕒 Only collect information that is necessary for the performance and primary function of eBASE Africa.
- 🕒 Notify stakeholders about why we collect the information and how it is administered.
- 🕒 Notify stakeholders that this information is accessible to them.
- 🕒 Collect personal information from the person themselves wherever possible.
- 🕒 If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- 🕒 Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- 🕒 Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).
- 🕒 Consider gender, disability and minority groups like indigenous populations and LGBTQ when collecting data and take extra measures to ensure these populations understand the meaning of the process

Use and Disclosure

eBASE Africa will:

- 🕒 Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- 🕒 For other uses, eBASE Africa will obtain consent from the affected person.
- 🕒 In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.



- 🕒 In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and eBASE Africa has provided an opt out and the opt out has not been taken up.
- 🕒 In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- 🕒 State in eBASE Africa's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as eBASE Africa is required to be.
- 🕒 Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then eBASE Africa must take steps to correct it. eBASE Africa may allow a person to attach a statement to their information if eBASE Africa disagrees it is inaccurate.
- 🕒 Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- 🕒 Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

Storage eBASE Africa

- 🕒 Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- 🕒 Before eBASE Africa discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. eBASE Africa will have systems which provide sufficient security.
- 🕒 Ensure that eBASE Africa's data is up to date, accurate and complete.

Destruction and de-identification eBASE Africa

- 🕒 Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- 🕒 Change information to a pseudonym or treat it anonymously if required by the person whose information eBASE Africa holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

eBASE Africa will:

- 🕒 Take reasonable steps to ensure the information eBASE Africa collects is accurate, complete, up to date, and relevant to the functions we perform.



Data Security and Retention

eBASE Africa will:

- 🕒 Only destroy records in accordance with the eBASE Africa's Records Management Policy.

Openness

eBASE Africa will:

- 🕒 Ensure stakeholders are aware of eBASE Africa's Privacy Policy and its purposes.
- 🕒 Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

eBASE Africa will:

- 🕒 Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

- 🕒 Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to other organisations

eBASE Africa can:

- 🕒 Release information to third parties where it is requested by the person concerned.

Related Documents

- [Privacy Policy](#)
- Records Management Policy



PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

privacy policy

Your privacy is important

This statement outlines **eBASE Africa**'s policy on how **eBASE Africa** uses and manages personal information provided to or collected by it.

The **eBASE Africa** is bound by the with penal code sections 299(1)(2), 3000(1) by law no. 2017/007; with exception during police investigation 300(2) and international convention on civil and political rights section 17.

The **eBASE Africa** may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the **eBASE Africa**'s operations and practices and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does the **eBASE Africa** collect and how does the **eBASE Africa** collect it?

The type of information the **eBASE Africa** collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Date of birth, demographic data, name
- Basic services indicators
- Race, tribe, nationality, ID card numbers, phone numbers
- Religion, income

Personal Information you provide:

The **eBASE Africa** will generally collect personal information held about an individual by way of [**OPTIONS: phone calls, forms, meetings etc**]. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances the **eBASE Africa** may be provided with personal information about an individual from a third party, for example another partner with whom we work.

In relation to employee records:

Under law no. 2016/007, the policy does not apply to the **eBASE Africa**'s treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the **eBASE Africa** and employee. However, the **eBASE Africa** must provide access and ensure compliance with the health privacy policy.

How will the **eBASE Africa** use the personal information you provide?



The **eBASE Africa** will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to research, the **eBASE Africa** will use your personal information for research where you have provided that information, and you have granted an informed consent to participation. Even as such, you are always free to opt-out after informed consent and request your information not be used for the research.

We may use audio, video or pictorial approaches in research and this could include your geolocation. You will be expected to sign a separate agreement for photo, voice, video or GPS release.

We will not use your data for marketing purposes. All personal information collected will comply with the HON code

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, the **eBASE Africa's** primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the **eBASE Africa** uses personal information of job applicants, staff members and contractors include:

for insurance purposes;

for creating corporate accounts

to satisfy the **eBASE Africa's** legal obligations.

Volunteers:

The **eBASE Africa** also obtains personal information about volunteers who assist the **eBASE Africa** in its functions or conduct associated activities, such as to enable the **eBASE Africa** and the volunteers to work together.

Marketing and fundraising:

The **eBASE Africa** treats partnerships and seeking donations for the future growth and development of the **eBASE Africa** as important. Personal information held by the **eBASE Africa** may be disclosed to an organisation that assists in the **eBASE Africa's** fundraising, for example, the **eBASE Africa's** partner organisations.

Who might the eBASE Africa disclose personal information to?

The **eBASE Africa** may disclose personal information after consent, including sensitive information, held about an individual to:

government departments;

donor agencies;

people providing services to the **eBASE Africa**; and

anyone you authorise the **eBASE Africa** to disclose information to.

Sending information overseas:



The **eBASE Africa** will not send personal information about an individual outside Cameroon without:
obtaining the consent of the individual (in some cases this consent will be implied).

We do/do not use overseas providers of IT services including servers and cloud services.

How does the eBASE Africa treat sensitive information?

In referring to 'sensitive information', the **eBASE Africa** means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The **eBASE Africa**'s staff are required to respect the confidentiality of personal information and the privacy of individuals.

The **eBASE Africa** has in place steps to protect the personal information the **eBASE Africa** holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

Updating personal information

The **eBASE Africa** endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the **eBASE Africa** by contacting the Privacy Officer of the **eBASE Africa** at any time.

The National Ethics Committee of Cameroon recommends the **eBASE Africa** not to store personal information longer than necessary. In particular, international Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information the **eBASE Africa** holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which the **eBASE Africa** holds about them and to advise the **eBASE Africa** of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information the **eBASE Africa** holds about you, please contact the Privacy Officer in writing.

The **eBASE Africa** may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, the **eBASE Africa** may charge a fee



to retrieve and copy any material. **eBASE Africa** If the information sought is extensive, the **eBASE Africa** will advise the likely cost in advance.

How long will the **eBASE Africa** keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way the **eBASE Africa** manages the personal information it holds, please contact the Privacy Officer. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the regional delegates of Health or Education for the North West Regions of Cameroon or call: +237698136325



APPENDIX A

Confidentiality Agreement

I agree to hold confidential all information that eBASE Africa has placed restrictions on, and to release it to persons outside the organisation only when authorised by the organisation and subject to any conditions set by the organisation.

I undertake to:

- 1) Access information held by the organisation only when necessary to the performance of my assigned duties;
- 2) Make copies of restricted information only when necessary to the performance of my assigned duties;
- 3) Oversee the storage and handling of restricted information to minimise the risk of its diversion into unauthorised channels;
- 4) Take reasonable care to properly secure confidential information on my computer and will take steps to ensure that others cannot view or access such information;
- 5) Not disclose my personal password(s) to anyone without the express written permission of my department head, or record or post it in an accessible location, and will refrain from performing any tasks using another's password; and
- 6) Notify my supervisor if I have reason to believe that my access codes and passwords have been compromised.

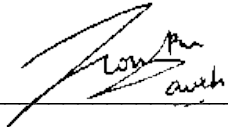
Signed _____

Date _____



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

