

DATA PROTECTION POLICY

VOCALISE AFRICA

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INTRODUCTION

Vocalise Africa strictly adheres to all data protection laws, especially the Data Protection Act, 2019, which establishes a comprehensive legal framework for the collection, processing, storage, and sharing of personal data. The law aligns closely with international standards such as the EU's GDPR, emphasizing principles like transparency, data minimization, and purpose limitation. It mandates that data controllers and processors obtain informed consent before handling personal data, implement adequate security measures, and respect individuals' rights, including the right to access, correct or delete their data.

SCOPE AND APPLICABILITY

This policy applies to all staff, volunteers, contractors and partners who handle data within Vocalise Africa, including:

- Personal data (from donors, beneficiaries and staff)
- Sensitive data (including from vulnerable populations we serve such as the Refugees)
- Organizational data (such as financial records and internal reports)

This policy therefore applies to all data collected, stored and processed in both digital and physical formats.

DATA COLLECTION

Types of Data Collected

Vocalise Africa uses the social transformation methodology to address various social challenges impacting Communities. In various stages of this engagement, the organisation collects various forms of data from our partners. These data include

Personal data such as Name, contact details, demographics (age, gender, and location) and Operational data: Records of interactions with beneficiaries, donors, and volunteers.

PURPOSE OF DATA COLLECTION

Data is collected for specific purposes, including:

- Service delivery to our beneficiaries
- Monitoring and evaluation of programs
- Compliance with legal and regulatory requirements
- Communication and engagement with stakeholders

CONSENT

We ensure that data is collected with the informed consent of individuals, and they are made aware of how their data will be used and stored. Explicit consent will be obtained for sensitive data and in instances where required by law.

DATA USE AND PROCESSING

Principles of Data Use

Data collected will be used for the specific purposes for which it was obtained and will not be processed in ways that are incompatible with these purposes. The following principles will be adhered to:

- Data Minimization: Only collect and process data that is necessary for the purpose.
- Accuracy: Ensure data is accurate and up-to-date, and implement regular checks for accuracy.

- **Transparency:** Inform stakeholders about data usage, processing, and their rights.
- **Accountability:** All data processing activities will be documented and accountable to senior management.

DATA SHARING

Data collected cannot be shared with any third parties (e.g. funders, partners, service providers) and shall only be used for the purposes it was intended for. Vocalise Africa shall not therefore share any form of data with all third parties. In the event of requirements by the laws of Kenya, any third-party acquiring data from Vocalise Africa shall be bound by confidentiality agreements and will be required to implement appropriate data protection measures to safeguard the communities we serve.

INTERNATIONAL DATA TRANSFERS

Vocalise Africa shall not transfer any data collected in Kenya outside the country or jurisdiction where it was collected. All measures have been put in place to ensure that data is adequately protected according to applicable laws and regulations, including using Standard Contractual Clauses or other safeguards as necessary.

DATA STORAGE AND RETENTION

Data Storage

Data will be stored securely to prevent unauthorized access, alteration, or loss. This includes:

- Using encrypted digital storage systems.
- Ensuring physical security for paper-based records
- Implementing access controls based on roles and responsibilities

DATA RETENTION

Data will only be kept for as long as it is necessary to fulfill the purposes for which it was collected or as required by law. Once data is no longer required, it will be securely destroyed in line with the organisation data protection procedures.

DATA SECURITY

Security Measures

Vocalise Africa will implement appropriate technical and organizational measures to safeguard data from unauthorized access, loss, alteration or destruction, including:

- Regular software updates and security patches
- Encryption of sensitive data both in transit and at rest
- Multi-factor authentication for systems containing sensitive data
- Staff training on data protection and security practices

Incident Response

In the event of a data breach or security incident, the organisation will:

- Notify affected individuals without undue delay
- Report the breach to the relevant authorities as required by law
- Investigate the cause of the breach and implement corrective measures to prevent recurrence

DATA ACCESS AND RIGHTS OF INDIVIDUALS

Access to Data

Access to personal data is restricted to individuals who need it for their roles within the organization. Data access will be granted based on the principle of least privilege.

Rights of Individuals

Individuals whose data are collected have the following rights:

- Right to Access: Individuals can request a copy of the data we hold about them.
- Right to Rectification: Individuals can request that inaccurate or incomplete data be corrected.
- Right to Erasure: In certain circumstances, individuals may request that their data be deleted.
- Right to Restrict Processing: Individuals can request that their data not be processed under certain conditions.
- Right to Object: Individuals can object to the processing of their data for specific purposes (e.g., marketing).

To exercise these rights, individuals can contact Vocalise Africa via email at protection@vocaliseafrica.org

COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS

Vocalise Africa strictly complies with all applicable data protection laws and regulations including:

- General Data Protection Regulation NGOs operating in Kenya.
- Kenya's Data Protection Act

- Any other relevant local, national or international data protection laws

We are committed to reviewing and updating our data management practices to ensure compliance with any changes in the law.

TRAINING AND AWARENESS

Vocalise Africa will ensure that all staff, volunteers and contractors receive training on data protection principles, including how to handle personal and sensitive data securely. Regular refresher training will be provided.

Data Protection Officer (DPO)

The Organisation has appointed a Data Protection Officer (DPO) from among the Board Members who is responsible for overseeing overall data protection compliance. The DPO shall closely work and report to the Executive Director on all matters regarding Data protection within the organisation. The Executive Director shall be the supreme officer in ensuring compliance with data protection in the organisation.

POLICY REVIEW AND UPDATES

This Data Policy will be reviewed regularly and updated as necessary to ensure it remains aligned with best practices, legal requirements, and organizational needs. Any changes will be communicated to all relevant stakeholders.