

Ekta's Personal Data Protection Policy

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1st updated the policy on August, 2023

2nd updated the policy on September, 2025

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1. Objectives and Scope

1.1 Policy Objectives:

Ekta has made the commitment to guarantee the privacy of individuals and ensure the protection of the Personal Data it obtains in carrying out its activities. This Data Protection Policy outlines how we collect, use, store, and process personal data in compliance with relevant data protection laws and regulations.

1.2. Scope

This Policy has been designed to apply personal data collect and process under the umbrella of Ekta through different project staff members regardless of the format and medium in which it is stored. This includes data collected from employees, volunteers, beneficiaries, donors, **consultants** and any other individuals associated under our project implemented jurisdiction.

1.3 Policy Review

This Policy will be updated by Ekta's Data Protection Officer (DPO) if there are;

- Significant changes to **Ekta's Organization** or Ekta's Personal Data Protection strategy
- Significant changes in risk exposure i.e. new threats, new trends etc.
- Significant changes in Applicable Legislation.

All modifications are subject to validation by the Management **Committee with the approval from the Executive Body of Ekta**. Any modifications will be communicated to Ekta staff members as well as all concerned in an appropriate and timely manner.

2. Organization and governance of Personal Data Protection

All individuals within Ekta play an active role in Personal Data Protection. Protecting Personal Data must be a constant concern, which informs operational policies, procedures and practices. The key contributors identified in this section accept and take on their roles and responsibilities in order to ensure that this Policy is implemented in a comprehensible and coordinated manner within Ekta.

2.1 Key Contributors

2.1.1. Ekta's strong commitment to Personal Data Protection of one of the Organization's strategic assets. As such, Personal Data Protection is safeguarded by **Executive Body of Ekta**, which must:

- Ensure appropriate governance of Personal Data Protection. Appropriate governance involves defining the role and responsibilities of all individuals within Ekta and involving the DPO – in an appropriate and timely manner – in all data protection related issues.
- Inform all staff members of the DPO's designation, missions and contact information.
- Ensure that the DPO:
 - Has the appropriate resources and means required to exercise his or her missions;
 - Exercise his or her missions independently
 - Receives appropriate training
 - Can report directly to the Executive Committee

3. Personal Data Collection and Processing Principles

In accordance with Applicable Legislation, Ekta commits to complying with the principles defined below when collecting and processing Personal Data.

3.1 Principle of “Lawfulness, Fairness and Transparency”: Ekta will only collect and process personal data when there is a lawful basis to do so. This includes consent, contractual necessity, legal obligation, vital interests, and legitimate interests pursued by Ekta or a third party.

3.2 Principle of “Purpose Limitation”: Ekta clearly define data collection purposes(s) prior to Personal Data collection. Purpose(s) must be specified, explicit and legitimate. Ekta must also ensure that pursued purposes(s) are compatible with its activities and will not be processed in any way incompatible with these purposes.

3.3 Principle of “Data Minimization” and “Accuracy”: Ekta will only collect and process the minimum amount of personal data necessary to achieve our stated purposes. Personal Data collected must be adequate, relevant and limited to what is necessary in relation to the purpose(s) pursued by Data Processing.

4. Consent

4.1 Voluntary Consent: Ekta will obtain explicit and informed consent from individuals before collecting and processing their personal data. Individuals have the right to withdraw their consent at any time.

4.2 Age Limit: If collecting data from individuals under the age of consent, we will obtain parental or guardian consent before processing their data.

4.3 In Special Case: If collecting data from individuals who is not mental sound or not in a state of response, we will obtain parental or guardian or any person related to him or her before processing their data.

5. Personal Data Security

Ekta takes technical and organisational measures to ensure Personal Data security, confidentiality and integrity throughout the entire data processing process. These measures are defined based on the following;

5.1 Security Measures: We will implement appropriate technical and organizational measures to ensure the security of personal data against unauthorized access, alteration, disclosure, or destruction. **The collected data in forms of video, documentation, study, resources and IECs compulsory stored in cloud.**

5.3 Submission of Data: Submission of programme related data by the concern Project-in-Charge to Data Protection Officer (DPO) within the 15 days of completion of programme.

5.2 Data Access: Access to personal data will be restricted to authorized personnel who have a legitimate need to access it for their job roles.

6. Principle of “Data Storage Limitation”

Ekta ensures that processed Personal Data is retained no longer than is needed for the purposes for which it is collected.

6.1 Retention Period: Data will be retained only for as long as necessary to fulfil the purposes for which it was collected, **(Both Finance and Programme data must be stored up to the period of 10 years from the end of the project period)** or as required by applicable laws and regulations.

6.2 Data Disposal: Personal data that is no longer required will be securely deleted, destroyed, or anonymized **after proper consultation with Data Protection Office (DPO) and approval from Executive body.**

7. Personal Data Transfers, Sharing and Third Parties

All transfers and sharing of Personal Data require additional attention and guarantees. Ekta ensures that all personal Data Transfers are **appropriately secured** and **executed lawfully** in compliance with requirements of Applicable Legislation.

7.1 Third Parties: We will not share personal data with third parties unless necessary for the fulfilment of our purposes and in compliance with applicable data protection laws.

7.2 Data Processors: If we engage third-party processors to handle personal data on our behalf, we will ensure that they provide sufficient guarantees regarding data protection.

8. Data Subject Rights

Ekta commits to guaranteeing the effective exercise of the rights granted to Data subjects by Applicable Legislation. Applicable Legislation grants Data Subjects the following rights;

8.1 Right to be Informed: The right to clear, precise and complete information regarding Ekta's use of Personal Data.

8.2 Right to Access: Individuals have the right to access their personal data and obtain a copy of the Personal Data held by the Data controller concerning the requesting Data Subject.

8.3 Right to Erasure, Rectification and Restriction: Individuals can request the erasure and correction of their personal data or the restriction of its processing under certain circumstances.

8.4 Right to Data Portability: Individuals can request a copy of their personal data in a structured, commonly used, and machine-readable format.

8.5 Right to Complaints: Individuals have the right to lodge complaints with the relevant data protection authority if they believe their data protection rights have been violated.

8.6 Right to withdraw Consent: The right to withdraw consent at any time when Data Processing is based upon Consent.

9. Data Protection Officer (DPO)

Ekta has appointed a **Data Protection Officer (DPO)** to ensure the Organization's compliance with Applicable Legislation and the fulfilment of commitments made in this Policy.

The DPO's missions within Ekta are the following;

- To inform and raise staff member awareness of Personal Data protection rules
- To ensure compliance with Applicable Legislation and fulfilment of commitments made in this Policy
- To inform, empower, and if necessary, alert General Body in relation to the risks that specific staff initiatives or non-compliance with DPO recommendations might generate for Ekta.
- To establish and keep up to date any documentation required by the data protection principle of accountability.

10. Staff Training and Awareness-Raising

Ekta ensures that all staff members are aware of the importance of Personal Data Protection and understand both the intention and scope of applicable legislation and the risks of non-compliance.

Where possible, Ekta will also provide specific training and awareness programs (both offline and online) to the employees, volunteers, and stakeholders to ensure a clear understanding of their roles and responsibilities in data protection.

11. Contact Information

For any questions, concerns, or requests related to data protection, please contact our Data Protection Officer at [DPO Email Address].

12. Modification and Review of Policy:

The Organization reserves the right to modify and/or review the provisions of this Policy from time to time, in order to comply with applicable legal requirements or internal policies, to the extent necessary.

Conclusion

This Data Protection Policy reflects Ekta's commitment to upholding the privacy and rights of individuals and ensuring the responsible handling of personal data.

1st Approval of the polices by the Board: 1st November 2024