

DATA PROTECTION & PRIVACY POLICY

1. PURPOSE

This policy sets out how the Wilson Erhun Foundation for Pharmacy Administration (WEFPA) collects, uses, stores, shares, and protects personal and sensitive data. It affirms WEFPA's commitment to privacy, confidentiality, lawful data processing, and responsible information management in line with applicable laws and international best practices.

2. SCOPE

This policy applies to:

- Members of the Board of Trustees and Advisory Board
- Executive Management
- Employees, consultants, and volunteers
- Fellows, interns, trainees, and programme participants
- Partners, contractors, and third parties processing data on behalf of WEFPA

It covers all forms of data processing, including physical, digital, online, and cloud-based systems.

3. DEFINITIONS

3.1 Personal Data

Any information relating to an identified or identifiable natural person.

3.2 Sensitive (Special Category) Data

Information revealing health status, biometric data, ethnicity, religious beliefs, or other data requiring enhanced protection.

3.3 Data Processing

Any operation performed on data, including collection, storage, use, disclosure, transmission, or deletion.

3.4 Data Subject

The individual to whom the personal data relates.

4. POLICY STATEMENT

WEFPA is committed to:

- Processing personal data lawfully, fairly, and transparently
- Collecting data only for specified, legitimate purposes
- Limiting data collection to what is necessary
- Protecting data against unauthorised access, loss, or misuse
- Respecting the rights of data subjects

5. LEGAL & REGULATORY FRAMEWORK

WEFPA shall comply with:

- Applicable national data protection laws
- Relevant regional and international standards (including GDPR principles where applicable)
- Donor and partner data protection requirements

Where multiple standards apply, the higher standard of protection shall prevail.

6. LAWFUL BASIS FOR DATA PROCESSING

Personal data shall be processed only where there is a lawful basis, including:

- Consent of the data subject



- Performance of a contract or agreement
- Compliance with legal obligations
- Legitimate interests of WEFPA, balanced against data subject rights
- Public interest or research purposes, where permitted by law

7. DATA COLLECTION & USE

- Data shall be collected directly from data subjects wherever possible.
- Data shall be used only for the purpose for which it was collected.
- Use of data for secondary purposes requires lawful justification and, where required, consent.

8. DATA SUBJECT RIGHTS

WEFPA recognises the rights of data subjects, including the right to:

- Be informed about data processing
- Access personal data
- Request correction or deletion
- Object to or restrict processing
- Withdraw consent where applicable

Requests shall be handled promptly and in accordance with applicable laws.

9. DATA SECURITY & CONFIDENTIALITY

WEFPA shall implement appropriate technical and organisational measures to:

- Protect data from unauthorised access, disclosure, alteration, or destruction
- Restrict access to authorised personnel only
- Secure digital systems, passwords, and physical records

All persons handling data have a duty of confidentiality.

10. DATA SHARING & DISCLOSURE

- Personal data shall not be shared with third parties without lawful justification.
- Data sharing agreements shall be used where appropriate.
- Cross-border data transfers shall ensure adequate levels of protection.

11. DATA RETENTION & DISPOSAL

- Personal data shall be retained only for as long as necessary for its purpose or as required by law.
- Secure disposal methods shall be used to destroy data that is no longer required.

12. DATA BREACH MANAGEMENT

- Any actual or suspected data breach shall be reported immediately to management.
- Appropriate steps shall be taken to contain, assess, and remediate breaches.
- Where required, affected individuals and authorities shall be notified in line with legal obligations.

13. ROLES & RESPONSIBILITIES

Board of Trustees

- Oversight of data protection governance

Executive Management

- Implementation and monitoring of this policy

All Covered Persons

- Compliance with data protection requirements



- Prompt reporting of data protection concerns

14. THIRD-PARTY PROCESSORS

- Third parties processing data on behalf of WEFPA must adhere to equivalent data protection standards.
- Compliance may be monitored through agreements or reviews.

15. WEBSITE PRIVACY NOTICE

WEFPA shall publish a clear and accessible **Privacy Notice** on its website outlining:

- Types of data collected
- Purpose of processing
- Data subject rights
- Contact information for privacy-related inquiries

16. NON-COMPLIANCE & SANCTIONS

Breaches of this policy may result in:

- Disciplinary action
- Termination of engagement
- Legal or regulatory consequences

17. MONITORING & REVIEW

This policy shall be:

- Reviewed every three (3) years or earlier if required
- Updated to reflect legal, technological, or organisational changes

18. RELATED POLICIES

- Code of Ethics & Conduct
- Safeguarding & Protection Policy
- Research Ethics & Publications Policy
- IT & Cybersecurity Policy

