



Center for Finance

# DATA PROTECTION POLICY

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## **1 PURPOSE**

The purpose of this Data Protection Policy is to establish principles and procedures for the lawful, fair, and transparent processing of personal data by the Center for Finance.

The organization is committed to protecting the privacy and personal data of all individuals it engages with, including employees, consultants, partners, and participants in its activities.

This Policy aims to:

- Ensure compliance with applicable data protection laws and regulations;
- Promote responsible handling of personal data;
- Protect the rights and privacy of individuals;
- Reduce the risk of data breaches and misuse.

This Policy reflects the organization's commitment to ethical conduct, accountability, and data security.

## **2 SCOPE**

This Data Protection Policy applies to all personal data processed by or on behalf of the Center for Finance in the course of its activities.

The Policy applies to all individuals associated with the organization, including employees, consultants, project staff, interns, and external collaborators who may have access to or process personal data.

This Policy covers all forms of data processing, including collection, storage, use, sharing, and deletion of personal data, whether in physical or digital format.

The Policy applies to personal data related to all stakeholders, including staff, partners, service providers, and participants in projects, trainings, and events.

All individuals covered by this Policy are required to comply with its provisions and ensure that personal data is handled in a secure and responsible manner.

## **3 DATA PROTECTION PRINCIPLES**

The Center for Finance processes personal data in accordance with the following core principles:

- Personal data is processed lawfully, fairly, and in a transparent manner. Individuals are informed about how their data is collected and used.
- Data is collected only for specific, explicit, and legitimate purposes and is not further processed in a manner incompatible with those purposes.

- The organization ensures that personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Personal data is kept accurate and up to date. Reasonable steps are taken to correct or delete inaccurate data.
- Data is retained only for as long as necessary to fulfill its purpose or to comply with legal and donor requirements.

Appropriate technical and organizational measures are applied to ensure the security and confidentiality of personal data and to protect it from unauthorized access, loss, or misuse.

The Center for Finance ensures accountability by maintaining appropriate documentation and demonstrating compliance with data protection principles.

#### **4 DATA PROCESSING & USE**

The Center for Finance processes personal data only where necessary for the implementation of its activities and in line with defined purposes.

Personal data may be collected and processed in the context of project implementation, recruitment and engagement of staff and experts, communication with partners and stakeholders, organization of events and trainings, and compliance with legal and donor requirements.

The organization ensures that personal data is used solely for the purposes for which it was collected and is not shared or disclosed without a valid reason. Where data is shared with partners, service providers, or donors, it is done in a controlled and appropriate manner.

Sensitive or confidential data is handled with additional care and only accessed by authorized individuals where necessary.

The Center for Finance avoids excessive collection of personal data and ensures that only relevant and necessary information is processed.

Through controlled and purpose-driven data processing, the organization ensures responsible use of personal data and protection of individual privacy.

#### **5 DATA SECURITY & PROTECTION MEASURES**

The Center for Finance applies appropriate technical and organizational measures to ensure the security and confidentiality of personal data.

Access to personal data is limited to authorized individuals who require it for the performance of their duties. Individuals handling personal data are expected to maintain confidentiality and ensure that data is not accessed, disclosed, or used improperly.

The organization ensures that personal data is stored securely, whether in physical or digital form. Electronic data is protected through secure systems, passwords, and controlled access, while physical documents are stored in secure locations.

The Center for Finance takes reasonable measures to protect personal data from unauthorized access, loss, alteration, or disclosure. This includes maintaining secure devices, using reliable communication channels, and avoiding unnecessary data sharing.

Regular attention is given to data handling practices to ensure that data protection measures remain effective and appropriate.

Through these measures, the Center for Finance ensures the integrity, confidentiality, and security of personal data.

## **6 RIGHTS OF INDIVIDUALS**

The Center for Finance respects and supports the rights of individuals in relation to their personal data.

Individuals have the right to be informed about how their personal data is collected and used. They may request access to their personal data and obtain information on how it is processed.

Individuals have the right to request correction of inaccurate or incomplete data, as well as the deletion of personal data where it is no longer necessary or where processing is not justified.

Where applicable, individuals may request restriction of processing or object to the processing of their personal data.

Requests related to personal data are handled in a timely and appropriate manner, in accordance with applicable laws and regulations.

Through respecting these rights, the Center for Finance ensures transparency, fairness, and trust in its data processing practices.

## **7 ROLES & RESPONSIBILITIES**

The Center for Finance ensures that responsibilities for data protection are clearly defined and implemented across the organization.

Senior management holds overall responsibility for ensuring that personal data is processed in accordance with this Policy and applicable legal requirements. This includes establishing appropriate procedures and ensuring that adequate safeguards are in place.

A designated responsible person may be assigned to oversee data protection practices, provide guidance, and support compliance with this Policy.

All employees, consultants, and collaborators who handle personal data are responsible for processing it in a secure, lawful, and responsible manner. They are expected to follow this Policy and apply appropriate care when handling personal data.

Individuals must immediately report any concerns, incidents, or suspected breaches related to personal data.

Through shared responsibility and clear accountability, the Center for Finance ensures effective protection of personal data.

## **8 DATA BREACH & INCIDENT HANDLING**

The Center for Finance takes all data protection incidents and potential breaches seriously and responds in a timely and appropriate manner.

A data breach may include any unauthorized access, loss, disclosure, or misuse of personal data. All individuals associated with the organization are required to promptly report any suspected or actual data breach.

Upon identification of a breach, the organization conducts an initial assessment to determine the nature, scope, and potential impact of the incident. Appropriate measures are taken to contain the breach and prevent further risks.

Where required, the organization ensures that relevant authorities, partners, or affected individuals are informed in accordance with applicable legal and donor requirements.

The Center for Finance takes corrective actions to address the causes of the breach and to strengthen data protection measures in order to prevent recurrence.

Through timely reporting and effective response, the organization ensures accountability and minimizes potential harm related to data breaches.

## **9 REVIEW, IMPLEMENTATION & FINAL PROVISIONS**

This Data Protection Policy is an integral part of the governance and operational framework of the Center for Finance and is binding for all individuals within its scope.

The organization ensures that this Policy is communicated and implemented across all levels. Individuals involved in the processing of personal data are expected to be familiar with its provisions and to apply them in their daily activities.

The Center for Finance is committed to regularly reviewing and updating this Policy to ensure its continued relevance and effectiveness. Reviews take into account changes in

organizational practices, legal requirements, donor expectations, and lessons learned from implementation.

Management is responsible for overseeing the implementation of this Policy and ensuring that appropriate systems and safeguards are in place.

This Policy enters into force on the date of its approval by the management of the Center for Finance. The most recent version of the Policy is applicable and accessible to all relevant stakeholders.

Through responsible data protection practices and continuous improvement, the Center for Finance ensures the security, confidentiality, and integrity of personal data.