

# **Data Protection Policy**

Effective Date: 25 Nov, 2025

EWD (Empowering With Digital) Foundation is committed to protecting personal information and ensuring compliance with relevant data protection laws, including the Nigeria Data Protection Regulation (NDPR) and any applicable international standards.

### 1. Purpose of This Policy

This policy outlines how we:

- Collect
- Process
- Protect
- Store
- Retain
- Delete

...personal data for learners, mentors, staff, partners, and website visitors.

### 2. Types of Data We Process

We may process:

- Personal identification data (name, email, phone number)
- Demographic information
- Programme participation data
- Assessment scores and feedback
- Device and technical information
- Communications and correspondence
- Images or videos from events (with consent)

# 3. Principles of Data Protection

We adhere to these key principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability



## 4. Legal Basis for Processing

We process personal data under the following grounds:

- Consent
- Legitimate interest
- Contractual necessity
- Legal obligation
- Vital interest (e.g., safeguarding concerns)

#### 5. Data Sharing and Disclosure

We may share data with:

- · Verified trainers and mentors
- Technology service providers (LMS, email tools, survey platforms)
- Donors (aggregated or anonymised reports only)
- Regulatory authorities when required by law
- We do not sell data.

## 6. Data Security Measures

We protect personal data using:

- Encrypted storage systems
- Access restrictions
- Secure data transfer protocols
- Regular security reviews
- Staff confidentiality agreements

#### 7. Data Retention

Personal data is retained only for the duration necessary to:

- Deliver programmes
- Meet reporting and regulatory requirements
- Maintain proper organisational records

Data that is no longer required is safely deleted or anonymised.



## 8. Rights of Data Subjects

Individuals have the right to:

- Access their personal data
- Correct inaccurate information
- Request deletion
- Withdraw consent
- · Request restriction of processing
- Object to processing
- Request data portability

Requests can be sent to: admin@ewdafrica.org

#### 9. Breach Notification

In the unlikely event of a data breach, we will:

- Assess the risk
- Notify affected individuals
- Report to authorities when legally required Take corrective action to prevent recurrence

#### 10. Contact for Data Protection Queries

Email: admin@ewdafrica.org