



## Privacy Notice

We want you to know that we take data protection very seriously! This notice shall give you a brief overview of the efforts we make to protect your personal data.

### What does “processing personal data” mean?

**Personal data** are data that relate to an identifiable person – directly or indirectly. Basically, it is information that tells something about you. Even if this information is not a secret it must still be treated carefully. **Processing** such personal data means all sorts of activities, such as collecting, storing, organising, sharing, evaluating, modifying, publishing, recording, using, deleting, etc. - essentially anything done to your personal data is “processing”.

### Who processes my personal data?

We are the entity that is responsible for the data processing. We are the so-called data controller.

#### We that is:

Polski Czerwony Krzyż/Polish Red Cross  
Data protection officer  
ul. Mokotowska 14  
00-561 Warszawa  
Poland

### Why do we process your personal data?

In order to be able to set up our cash assistance we require certain personal data about you.

#### In this context, we collect/use/store/etc. your data for the following purposes:

- Evaluate whether you fit with the targeting criteria
- Verify your eligibility for the programme
- Effectuate the cash distribution to you
- Check your identity
- Avoid fraud and duplication
- Calculate the cash grant
- Keep you informed on the cash transfers
- Evaluate and contact you in case additional assistance programme are put in place in the future
- For coordination with other Humanitarian Organizations, such as agencies of the United Nations (see more below)

### Which personal data do we process?

We collect/use/store personal data about you only if and to the extent this is **necessary** in order to fulfil the purpose of the cash programme described above.

#### We collect/use/store/etc. the following categories of personal data:

- Bio data\*: Name, surname, date of birth, sex, ...
- Identification\*: original identification document with picture, tax number, passport, ...
- Contact details: phone number, email address, ...
- Eligibility criteria: household composition, household member disability, country of residence, legal status, ...

### Do we share your personal data?

In the context of our programme, other organisations are involved in order to provide our services to you. They require us to share certain personal data about you with them. However, **we limit the data shared to the minimum**



**necessary** and **we act very carefully** in order to keep your data safe and confidential. All partners we share your personal data with have undergone a thorough reliability check. – if no data are shared, insert „No, we keep your data safe and confidential. “

#### Other organisations we might share your personal data with are:

- Financial Service Providers – they help us to distribute the financial assistance to you where we use bank accounts/ mobile money/where you can withdraw money at the counter of a bank's branch from our virtual accounts – “Sometimes, these providers are required by law to collect certain information in order to be allowed to distribute funds to you”.
- Merchants – they cooperate with us in the voucher programme and require a limited amount of your personal data to
- Other NGOs – for example UNHCR – they cooperate with us in order to align help programmes (e.g., to avoid duplication or to coordinate assistance). They may also use your personal data as a basis for a new help programme they intend to set up. In some cases UNHCR may register your data with a government in relation to having refugee status recognized. (Please see the categories of personal data above, marked with an “\*”). We will specifically ask you if you agree to the sharing of personal data with other humanitarian organizations. You may then indicate if you agree to this sharing.
- Government – the government may require some of your personal data in order to gain an overview about the programme or to avoid duplication
- Donor – the donor has to fulfil audit requirements and might require a limited amount of your personal data in this context
- Red Cross and Red Crescent Movement - IFRC, ICRC, and National Societies – coordinate to provide assistance for those on the move
- Other third parties (outsourced help desk, data management provider) – they help us to answer questions, maintain the data and address issues

#### What is our legitimate basis to process your personal data?

We only process your personal data if and to the extent this is necessary for the programme. Nevertheless, all processing of personal data requires a legitimate basis. This means that we have to have a justification for processing your personal data in the context of our programme. This justification only encompasses the processing of personal data as far as this is necessary for the respective purpose.

#### We process your personal data based on one or more of the following bases:

- Your **vital interest** – the help programme intends to help you in an existential crisis that threatens your life, integrity, health, dignity, or security  
>> We rely on this legitimate basis for processing activities that directly serve the purpose of providing you with financial assistance (e.g., verify eligibility, distribute money, etc.)
- The **public interest** – we act under a humanitarian mandate which is recognized to be in the general interest  
>> We rely on this legitimate basis for processing activities that directly serve the purpose of providing you with financial assistance (e.g., verify eligibility, distribute money, etc.), if they are not in your vital interest
- Our **legitimate interest** – certain processing activities are in our legitimate interest [facilitate communication of team members, practicability, efficiency, cost reduction, etc.]. Where this is the case, we carefully balance our legitimate interest with your interests and rights to privacy. We will only process your personal data on this legitimate basis, if we can be sure that you have no opposing, overwhelming interest  
>> We rely on the justification of legitimate interest, where the processing activities serve administrative, organisational and cooperational purposes that are important for us to ensure smooth and efficient processing.

#### Where and for how long do we store your personal data?

We are aware of the great responsibility that we have with your personal data. We do our best to keep them from being lost, stolen or accessed by people who are not authorized to do so. We will only keep them for as long as



necessary for the programme (one year), if not other reasons require them to keep them for a longer period (f.ex. audit purposes).

**We store your personal data in the following way:**

- We work with a strict need-to-know concept – only persons that require to know about your personal data, will have access to them
- All of our staff has an obligation to treat your personal data with utmost confidentiality
- We store your data on:
  - a **database** – this data base is set up and maintained by our IT Management Team and responds to high security standard and is protected by password
  - **laptops** and other **media** – our staff use this hardware to ensure a smooth programme flow and have the obligation to protect it with passwords
- We verify in regular intervals if we still require all personal data stored. If this is not the case, we delete them permanently. Please note that even after the personal data are no longer necessary for the original purpose it might still be necessary and justified to store them for other purposes – f.ex. audit purposes.
- In case we have transferred your personal data to another organization (as indicated above), we will include relevant personal data deletion clauses in our contracts with those organizations. This means that those organizations will also be responsible for deleting your data (or removing the identifiable parts of it) when it is no longer needed.

## What are your possibilities?

You have various options if you are not satisfied with the way we treat your personal data.

**You may ask us to**

- **correct** your personal data if they are not accurate
  - **get access** to your personal data
  - **erase** your personal data under certain circumstances
  - **object** to the processing or certain aspects of it under certain circumstances
- Please note that the exercise of the last two rights might impact your participation in the programme, if the processing activity is essential.
- [launch an official complaint with the regulatory authority: [insert] – if appropriate under national law]
  - [add other data subject rights – if available under national law]

## Who could you contact?

In case you have any questions, we are happy to answer them. Please do not hesitate to contact:

our team	our Data Protection Officer
Polish Red Cross data protection officer (iod@pck.pl) with additional support of IFRC (dataprotection@ifrc.org)	