

## COAST Data/Information Sharing/Protection Protocol. Prepared in December, 2022

### 1. Introduction:

COAST is a people-centered non-governmental organization that believes in full transparency and accountability. COAST also believes in open communication and the right of its program participants, staff, and stakeholders to know information. Considering these, COAST is always ready to share data or information.

COAST believes that all personal, sensitive, and non-personal data of COAST program participants, stakeholders, and staff will be shared more easily.

The guidelines for utilizing and sharing information are outlined in this protocol and must be adhered to by everyone employed by or affiliated with the Partner Organizations.

This protocol intends to define and regulate working procedures within the organization, between Partner Organizations, as well as to give the Partner Organizations a framework. The protocol also provides instructions to make sure that data is transferred securely and that it is only shared when it is necessary and legal.

### 2. Definition:

The terms "data" and "information" are interchangeable in this protocol. Any information on a person who may be personally identifiable from that information, whether it be in manual or electronic records, audio or visual records, or other types of records, is referred to as personal data.

When we refer to "data sharing," we refer to the disclosure of data or information from one or more organizations to one or more third-party organizations, as well as the exchange of data inside an organization.

### 3. Shared data may be in the form of:


- 3.1 an exchange of data back and forth;
- 3.2 data provided to a third party or parties by one or more organizations;
- 3.2 data pooled by several organizations and made available to each other;
- 3.4 data pooled by several organizations and made available to a third party or parties
- 3.5 extraordinary, one-time disclosures of information in urgent or unanticipated situations


### 4. The base of Processing Data

Every time COAST processes personal data, at least one of the following six legal justifications must be present:

- 4.1 Consent: The person has formally authorized the processing of personal data for the intended use.
- 4.2 Contract: Because of a contract COAST has with the person, or because they have requested that COAST take specified actions before entering into a contract, the processing is required.

  
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Executive Director  
COAST Foundation


  
Dr. Tofail Ahmed  
Chairperson  
COAST Foundation




- 4.3 Legal requirement: the processing is required for COAST to abide by the law (not including contractual obligations).
- 4.4 Vital interests: a person's life is at risk; hence the processing is required.
- 4.5 Public task: The processing is required for COAST to carry out a duty in the public interest or in the course of its official business, and the duty or business has a clear legal foundation.
- 4.6 Legitimate interests: Unless there is a compelling basis to preserve the privacy of the data subject, the processing is required for the purposes of COAST's or a third party's legitimate interest.

## 5. The Framework

Data and Information Sensitivity Classification		
Sensitivity Level	Data and Information Types	Classification: <i>Public/Restricted/Confidential</i>
<p><b>Low or No Sensitivity</b> Information or data that would be unlikely to harm program participants, affected people, or staff if disclosed or accessed without the right authority.</p>	<ol style="list-style-type: none"> <li>1. Organizational profile, budget, expenditure, and program plan.</li> <li>2. Budget and plan for the program/project.</li> <li>3. Meeting minutes.</li> <li>4. Publications and newsletters.</li> <li>5. Staff contact details.</li> <li>6. Accreditation Certificate(s).</li> <li>7. Organizational constitution, profile, policies, mission vision, strategy plan, and other materials are already posted on the organization website.</li> <li>8. Office address and contact information.</li> <li>9. External and Internal Audit Reports, Financial trends.</li> <li>10. Reports, presentations, pamphlets, and more. A list of the Executive Committee/General Council and way to reach them (email).</li> <li>11. List of member/program participants in the program (if they have consent)</li> </ol>	<p><b>Classification: Public</b> <i>(Data or information may be publicly disclosed.)</i></p>
<p><b>Moderate Sensitivity</b> Information or data that, if revealed or accessed without the right authorization, would probably result in some level of bad effects and/or</p>	<ol style="list-style-type: none"> <li>1. Organizational Bank Statement.</li> <li>2. Information on member/program participants who received assistance.</li> <li>3. Project Proposal(s)</li> <li>4. Beneficiary feedback and complaint information relating to CRM (Complaint Response Mechanism) and complaints related to PSEAH (Protection from Sexual Exploitation, Abuse and Harassment).</li> </ol>	<p><b>Classification: Restricted</b> <i>(Data or information can be shared within a wider humanitarian community, based on a clearly specified purpose and related standards for data protection.)</i></p>

  
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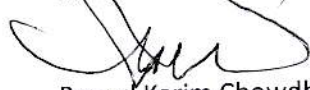



disadvantage for those who would be affected by it as well as for staff.		
<b>Severe Sensitivity</b> Information or data that, if revealed or accessed without the right authorization, is likely to seriously harm or have a negative impact on the program participants, affected population, staff, or anyone.	<ol style="list-style-type: none"> <li>1. Personal data including bank information unless asked by the government agency(ies)</li> <li>2. Personnel file(s) unless approved by the Executive Director.</li> <li>3. Personal Salary and Benefits</li> <li>4. Personal Bank Statement and wealth information</li> <li>5. Personal medical record/health status, e.g. people living with HIV/AIDs, mental health condition</li> <li>6. Staff information about corruption/misappropriation if any</li> <li>7. Data or information of GBV (Gender-based Violence) survivor</li> <li>8. Data and information on the survivor of child abuse or any other abuse</li> <li>9. Data and information about the complaint lodger, whistle blower</li> <li>10. Personal data and information related to personal safety.</li> <li>11. Copies of bills and vouchers, payment slips, etc.</li> <li>12. Personal information of member/program participants.</li> </ol>	<b>Classification: Strictly Confidential</b> <i>(Highly limited, bilateral disclosure only).</i>

**6. Approved by EC (Executive Committee), effective date, monitoring and reporting**  
The review of this protocol has been approved unanimously in the 116<sup>th</sup> EC meeting held on 21 December, 2022 and be effective in no delay. Deputy Executive Director will monitor and report the implementation progress of this protocol in the organization.

**7. Orientation**  
The protocol will be oriented to the staff/volunteers, member/program-participants, stakeholders and partners.

**8. Review of this protocol:**  
This protocol will be reviewed before or in December, 2025 with the significant changes made in the national and international laws, policies, human rights declaration.

  
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