



Uttaran

Uttaran Data Management & Data Protection Policy

Community Mobilization

Poverty Eradication

Environmental Justice

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Definitions

Anonymization means the process of modifying data sets, making it permanently impossible to identify individuals.

Data Breach means a breach of security leading to the accidental or unlawful destruction, loss or alteration of - or to the unauthorized disclosure of, or access to – Personal Data transmitted, stored or otherwise processed.

Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

Data Processor means an at ural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller.

Data Subject(s) means a natural person (i.e. an individual) who can be identified, directly or indirectly, in particular by reference to Personal Data.

Data Transfer mean any act that makes Personal Data accessible, whether on paper, via electronic means or the internet, or any other method to any Third Party not linked in a way or another to Uttaran.

International Organization(s) means an organization and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

Personal Data means any information relating to an identified or identifiable natural person. This may include an identifier such as a name or audio-visual materials, an identification number, location data or an online identifier; it may also mean information that is linked specifically to the physical, physiological, genetic, mental, economic, cultural or social identity of a Data Subject. The term also includes data identifying or capable of identifying human remains.

Processing means any operation or set of operations–by automated an do the means–that is performed upon Personal Data or sets of Personal Data, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmitting, disseminating or otherwise making available, aligning or combining, or erasing.

Recipient means Third Party, public authority, agency or other body – that is, someone or something other than the Data Subject or Uttaran– to which the Personal Data is disclosed.

Sensitive Personal Data means specific Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic Data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Third Country means any other country or jurisdiction outside of Switzerland.

Third Party means a natural or legal person, public authority, agency or body other than the Data Subject or Uttaran.

1. Introduction

Uttaran is deeply committed to safeguarding and protecting the personal data of all individuals (project participants, staff and stakeholders) associated with its operations. Uttaran recognizes the critical importance of having robust data protection standards in place to mitigate the risks associated with personal data processing and ensure that the privacy of individuals is respected.

To fulfill its mission, Uttaran collects and processes various types of personal data. This data includes, but is not limited to, information about staff members, donors, suppliers, business contacts, visitors to Uttaran's facilities, beneficiaries, and other individuals with whom the organization interacts or may need to contact. This information may include sensitive personal data, such as health information, ethnic origin, political beliefs, religious affiliations, and more.

Safeguarding personal data is crucial in protecting the lives, integrity, and dignity of individuals. The processing of personal data impacts all areas of Uttaran's activities, whether operational or administrative, including program delivery, personnel management, communications, donor relations, and service provision.

This Data Protection Policy sets out the principles and guidelines Uttaran follows when collecting, processing, storing, sharing, and transferring personal data. It also outlines the procedures Uttaran follows in case of data transfers (particularly across borders) and in the event of a personal data breach, ensuring compliance with applicable reporting requirements.

The aim of this policy is to:

- a) Ensure Uttaran's compliance with both national and international data protection laws and regulations.
- b) Protect the rights of data subjects, ensuring that their personal data is handled transparently and securely.
- c) Minimize the risk of data breaches by implementing strong protective measures and procedures.
- d) Protect Uttaran from potential legal sanctions, including financial penalties, which may arise from non-compliance with data protection regulations.

Defined terms appear in capital letters throughout this Policy and are clarified in the Definitions section.

2. Purposes of the Policy

This Policy applies to Personal Data processed by Uttaran. It applies to: staff members of the Uttaran including staff, individuals seconded by other organizations and volunteers regardless of location and office type, other Uttaran stakeholders, anyone Processing Personal Data under the name of Uttaran or using the Uttaran logo or anyone using IT tools or systems provided by the Uttaran, collectively referred to as "Uttaran Personal Data Users".

This Policy comprises the internationally accepted data protection principles without replacing the existing national laws. It supplements the national data protection laws. The relevant national law will take precedence in the event that it conflicts with this Policy or it has stricter mandatory requirements than this Policy. In particular, the reporting requirements


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for data Processing under applicable national laws must be observed. The content of this Policy must also be observed in the absence of corresponding national legislation.

3. Principles of data processing

3.1 Data lawfulness and fair Processing

Uttaran processes Personal Data in a lawful and fair manner in relation to the Data Subject. Uttaran only processes Personal Data with respect to this Policy and applicable laws. In order to do so Uttaran ensures that a legal basis of Processing Personal Data exists such as the following:

3.1.1 Consent of the Data Subject

Uttaran ensures that consent is obtained from the Data Subject prior to Processing Personal Data. This consent is obtained in writing or electronically for the purposes of documentation and is valid only if given voluntarily. If, for any reason, the consent of the Data Subject is not given before Processing Personal Data, it should be secured in writing as soon as possible after the beginning of the Processing. Uttaran takes particular care in Processing Sensitive Personal Data and will only do so with prior written consent of the Data Subject. Consent will be recorded, and data subjects will have the ability to withdraw their consent at any time with no adverse effect. Withdrawal of consent will be made as easy as providing it.

3.1.2 Legitimate Interest of the Uttaran

Uttaran may process Personal Data without express consent if it is necessary to enforce a legitimate interest of Uttaran or a Third Party provided that interest is not overridden by the interests and rights of the individual. At Uttaran, legitimate interest exists where there is a relevant and appropriate relationship between Uttaran.

3.1.3 Contractual obligation

Uttaran may process Personal Data in order to enforce a contract entered into with the Data Subject or to comply with a contractual obligation.

3.1.4 Compliance with a legal obligation

In other cases, the Processing of Personal Data may be necessary to comply with applicable law.

3.1.5 Public interest

Uttaran may process Personal Data for the performance of a task carried out in the public interest or in the exercise of official authority vested in Uttaran.

3.2 Data transparent processing

Either before or at the time of collection of any Personal Data, Uttaran is required to.

- inform Data Subjects about what kind of Personal Data Uttaran collects;
- the purposes of the Processing;
- the reason for collecting the Personal Data;
- the legal basis which is being relied upon;

- the Data Subjects' rights in relation to the Personal Data;
- security measures taken in relation to the Personal Data;
- whether Uttran transfers Personal Data to third parties;
- the retention period and any potential transfers of Personal Data outside of Bangladesh.

3.3 Data restriction to a specific purpose

Uttaran ensures that personal data is collected and processed only for specific, clearly defined purposes. Personal data should be adequate, relevant, and limited to what is necessary in relation to the purpose for which it is processed.

Uttaran will not process data beyond what is necessary for the specified purpose, and any data collected for a particular purpose will not be used for other unrelated purposes.

3.4 Data Minimization

Uttaran ensures that only the minimum amount of Personal Data necessary to achieve the specified purpose is collected and processed. Personal Data should be adequate, relevant, and limited to what is required in relation to the purpose for which it is processed. Any data collected beyond the necessity for the defined purpose should not be processed.

3.5 Data Accuracy

Uttaran Personal Data Users must ensure that Personal Data kept on file is correct and kept up to date. Inaccurate or incomplete Personal Data should be rectified or deleted. The exception to this principle would be the case when a legitimate interest exists to retain Personal Data. Historical data, accurate at the time of collection can be kept for as long as it is required to be kept. Once historical data is no longer necessary it should be deleted.

3.6 Data Integrity and confidentiality

Uttaran will implement appropriate technical and organizational measures to protect personal data in confidential manner against unauthorized access, accidental loss, destruction, or damage. This includes encryption, secure access controls, network security, and regular data security monitoring to ensure data protection standards are met.

3.7 Respect for Data Subject Rights

Uttaran is committed to upholding and respecting the rights of data subjects in relation to their personal data, ensuring that individuals have the ability to:

- ✓ Access their personal data
- ✓ Rectify inaccurate or incomplete data
- ✓ Request the erasure of their data (Right to be Forgotten)
- ✓ Object to processing or restrict processing in certain cases

These rights will be effectively communicated to data subjects, and Uttaran will ensure that these rights are exercised promptly upon request.

3.8 Data Retention, destruction and archiving of data

Uttaran keeps Personal Data for as long as it is necessary to perform its activities and as is required by applicable law. Personal Data not useful for Uttaran should be deleted unless national legislation requires it to be retained for a certain period of time. Uttaran will also delete personal data if the data subject withdraws his or her consent for processing unless another legal basis of processing the personal data exists which prevents Uttaran from deleting the personal data.

Uttaran may store Personal Data for archiving purposes for a determined period compatible with applicable laws.

4. Rights of the Data Subjects

Uttaran respects rights conferred to Data Subjects to ensure protection of Personal Data. These rights include:

4.1 Right to receive information

At a minimum, Uttaran Personal Data Users must provide the Data Subject with the following information when Personal Data is obtained:

- ✓ whether Uttaran is the Data Controller;
- ✓ the purpose of Data Processing;
- ✓ third-parties to whom the data might be transmitted;
- ✓ the existence of this present Policy;
- ✓ the focal point for questions/concerns or complaints.

This information should be communicated to the Data Subject even in cases where the Personal Data was not obtained directly from the Data Subject.

4.2 Right to access to the data

The Data Subject may request which Personal Data relating to him or her has been collected and stored, how the Personal Data was collected, and for what purpose. Requests from the Data Subject wishing to verify what Personal Data is held by Uttaran must be submitted in writing using the prescribed form

Disclosure of Personal Data should not be automatic. Uttaran Personal Data Users must consider all the circumstances surrounding the request for access and any restrictions to access that may be applicable. Access to Personal Data will only be given to the Data Subject if his or her identity can be verified.

4.3 Right to rectification of data

If Personal Data is incorrect or incomplete, the Data Subject can request be corrected or supplemented. This will only be considered if the identity of the Data Subject can be verified. Upon verification of the allegation, Uttaran will make the necessary change(s). In certain circumstances historical data may need to be kept in accordance with **section 3.5 Accuracy**.

4.4 Right to erasure - "Right to be forgotten"

The Data Subject may request his or her Personal Data to be deleted if the Processing of such Personal Data has no legal basis, or if the legal basis has ceased to apply. The same

applies if the purpose behind the Data Processing has lapsed or has ceased to be applicable for other reasons.

However, the right to erasure does not apply, and Personal Data will continue to be retained:

- ✓ for the implementation of the Mission of Uttaran;
- ✓ if it serves a public interest;
- ✓ for historical, statistical and scientific purposes; or
- ✓ for the establishment, exercise or defense of legal claims;
- ✓ for other legitimate interests (legal and financial).

4.5 Right to Personal Data Portability

The Data Subject has the right to receive his or her Personal Data in a structured, commonly used and machine-readable format and has the right to transfer such Personal Data to another Data Controller provided the Processing was based on consent or was necessary for the performance of a contract and was carried out by automated means.

Where technically feasible the Data Subject may request Uttaran to transfer his or her Personal Data to another Data Controller.

4.6. Right to Object to Processing

Data subjects have the right to object at any time to the processing of their personal data, including when their data is processed for direct marketing purposes or profiling. They also have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects or similarly significantly affect them.

Procedure for Exercising the Right to Object:

- ✓ Data subjects wishing to exercise their right to object to processing should submit their request to Uttaran's Data Protection Officer (DPO) or relevant personnel via the provided contact details.
- ✓ Upon receiving the objection, Uttaran will cease the processing of personal data unless there are compelling legitimate grounds for processing that override the data subject's interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defense of legal claims.

Right to Object to Direct Marketing:

- ✓ Data subjects have the right to object at any time to the processing of their personal data for direct marketing purposes. If the data subject objects to the processing of their data for direct marketing, Uttaran will no longer process the data for this purpose.

Right to Object to Profiling:

- ✓ Data subjects also have the right to object to decisions based solely on automated processing, including profiling, that produces legal effects or similarly significantly affects them.

4.7. Clear Procedures for Exercising Rights

Data subjects can exercise their rights by submitting a request via email (uttaran.head.office@uttaran.net), or in person at Uttaran's offices. Requests will be


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processed within the required timelines after identity verification.

Contact Details:

Email: uttaran.head.office@uttaran.net

In-Person: Uttaran Headquarters or Regional Offices

Uttaran will respond to all requests promptly and in accordance with legal requirements.

4.8. Right to Restriction of Processing

The Data Subject has the right to restrict the Processing of his or her personal data where there exists a particular reason for the restriction. This means that the Data Subject can limit the way that an organisation uses his or her Personal Data. This may be because:

- ✓ the accuracy of the Personal Data is contested by the Data Subject;
- ✓ the Processing is unlawful and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use instead;
- ✓ Uttaran no longer needs the Personal Data for the purposes of the Processing, but the Personal Data is required by the Data Subject for the establishment, exercise or defense of legal claims;
- ✓ the Data Subject has objected to the Processing pending the verification whether the legitimate grounds of Uttaran override those of the Data Subject.

4.9 Right to Withdraw Consent

Data subjects have the right to withdraw their consent at any time, where their personal data is being processed based on consent. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Procedure for Withdrawing Consent:

- ✓ Data subjects may withdraw their consent by contacting Uttaran's Data Protection Officer (DPO) or relevant personnel via the provided contact details.
- ✓ Upon receiving a request to withdraw consent, Uttaran will promptly cease the processing of personal data, unless there is another lawful basis for processing under applicable data protection laws.
- ✓ The withdrawal of consent will be communicated in writing or electronically, and Uttaran will confirm receipt of the withdrawal and take appropriate action in accordance with the law.

Impact of Withdrawal of Consent:

- ✓ If the personal data is necessary for the continued provision of services, the withdrawal may limit the ability to provide the full range of services offered.
- ✓ Uttaran will inform the data subject of any limitations resulting from the withdrawal of consent.

5. Uttaran Commitments

5.1 Responsibility/ Accountability

5.1.1 It is the responsibility of Uttaran Personal Data Users to ensure that Personal Data processed for or on behalf of Uttaran, is in compliance with this Policy.

5.1.2 It is the responsibility of Uttaran Personal Data Users to ensure that Data Subjects:

- ✓ Understand that Uttaran is bound by this Uttaran data protection policy to protect personal data of data subjects participating in Uttaran work;
- ✓ Consent to their personal data being processed in the context of Uttaran work;
- ✓ Agree that their personal data could be transferred to countries with laws that may not provide adequate level of protection.

5.1.3 Uttaran Personal Data Users will ensure that Third Parties they allow to process Personal Data:

- ✓ agree to use the personal data they access only in the context of Uttaranwork;
- ✓ comply with this policy and applicable laws. this is so even when the Uttaran personal data users provide access to personal data to people within their network, third party or through social media, other online groups, chatrooms or bulletin boardsetc.
- ✓ understand that they remain bound by these obligations with regard to Personal Data/work undertaken while they were part of Uttaran even after their contribution to Uttaran work ends.

5.1.4 Uttaran recognizes the importance of equipping its staff with the knowledge and skills necessary to manage and protect personal data effectively. As part of its commitment to ensuring data protection, Uttaran provides training to its staff on handling sensitive personal data, understanding data confidentiality principles, and exercising the rights of data subjects. This training is conducted during staff onboarding, as well as during project-specific orientations, and is adjusted based on the nature of the project and available funding. Through these ongoing educational efforts, Uttaran aims to foster a culture of accountability and ensure that staff are fully aware of their responsibilities regarding data protection.

5.1.5 Data Protection Officer (DPO)

- ✓ Uttaran will appoint a Data Protection Officer (DPO) who will oversee and monitor the organization's compliance with this policy.
- ✓ The DPO is responsible for ensuring that all personal data processing activities align with legal requirements and data protection standards.
- ✓ The DPO will serve as the primary point of contact for regulatory authorities and data subjects, ensuring that all data subject rights are respected and responded to promptly.
- ✓ The DPO will also be responsible for conducting regular audits, training staff on data protection best practices, and supporting Data Protection Impact Assessments (DPIAs) when required.

5.2 Uttaran Portals and Tools

Uttaran personal data users may have access to personal data in Uttaran portals. Uttaran personal data users undertake to use personal data exclusively for Uttaran work and will ensure that personal data under the irresponsibility is kept up-to-date, in the Uttaran portal and any other it tool in which Uttaran personal data user is required to enter personal data.

5.3 Arrangements with our partners (including consultants)

In particular, when Uttaran collaborates with another entity in processing personal data, Uttaran personal data users should ensure that the responsibilities of all the parties concerned as described in this policy or applicable law are outlined very clearly and set out in a contract or other legally binding arrangement. Uttaran will evaluate third parties to ensure that appropriate technical and organizational measures are in place to protect personal data.

5.4 Data protection by design and by default

In particular, while designing a database and drafting procedures for collecting Personal Data, the principles of data Processing and the rights of Data Subjects stipulated in the present Policy must be taken in to account and incorporated to the greatest extent possible.

5.5 Data security and storage

Uttaran personal data users should process personal data in a manner that ensures an appropriate degree of security. This includes prevention of unauthorized access to or use of personal data and the equipment used for data processing. This relates in particular to access rights to databases, physical security, computer security and network security, the duty of discretion and the conduct of all Uttaran personal data users who have access to personal data.

Uttaran personal data users undertake to store electronic equipment and personal data safely. Uttaran has implemented technical measures to ensure that personal data stored electronically (such as on shared drives, union portal, CRM, HRMS, etc.) Is protected from unauthorised access, accidental deletion and malicious hacking attempts. To the extent possible, personal data should be stored on those systems and Uttaran personal data users should avoid keeping personal data on personal devices (such as laptops, tablets, smartphones, usb drives, dvds etc.) And should protect by strong passwords access to any system used. In cases where Uttaran personal data users are using external tools not provided by Uttaran to process personal data, they undertake to ensure that appropriate technical and organisational measures to protect personal data are implemented prior to processing it and should formally document such use and keep the documentation available for auditing purposes.

When personal data is stored physically or when personal data usually stored electronically has been printed it should be kept in a physically secure place where unauthorized people cannot see it (e.g. In a locked drawer or filing cabinet). Papers and printouts containing personal data should not be left where unauthorized people could access them (e.g. On a printer) and should be shredded and disposed of securely when no longer required.

In any case, when retention of personal data is no longer necessary, all records should be securely destroyed or anonymised. Anonymisation of personal data is allowed if it is necessary to Uttaran's mission.

5.6 Communication Consent

Uttaran ensures that explicit consent is obtained from data subjects for all forms of communication, including newsletters, marketing materials, and project updates. Personal data will not be used for communication purposes without prior consent, and individuals have the right to withdraw consent at any time.

All communications will align with data protection principles, ensuring that data subjects are


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informed about the purpose of the communication and how their personal data will be used.

5.7 Close of relationship with Uttaran

Individuals whose mandate, employment relationship or any other type of relationship with Uttaran has ended, undertake to destroy any Personal Data in their possession which this Policy applies to and will certify its destruction in writing (if required). For Uttaran's staff this will be done in accordance with Human Resources instructions.

5.8 Data Storage and Security Practices

Uttaran recognizes that personal data may be stored on various devices, including personal gadgets, as part of daily operations across different projects. However, it is essential that personal data is handled with care and in compliance with data protection principles.

5.7.1 General Data Storage and Security Guidelines:

- ✓ Personal data should be stored on approved systems and devices (e.g., office computers, secure cloud-based systems). If personal gadgets (e.g., laptops, smartphones, USB drives) are used for data storage, appropriate security measures such as encryption and password protection must be implemented.
- ✓ Access to personal data is restricted to authorized personnel only. Employees must ensure that personal data is not shared or accessed by unauthorized individuals, including colleagues or third parties.
- ✓ When storing personal data on personal devices, employees must ensure that the devices are secure and used solely for work-related purposes. Any personal gadgets used for data storage must be protected with strong passwords, encryption, and regular security updates.
- ✓ Paper-based documents containing personal data should be securely stored in locked cabinets or other secure locations to prevent unauthorized access.
- ✓ When personal data is no longer required, it must be securely deleted or shredded. For electronic data, this includes permanent deletion from devices and cloud storage. For paper-based data, it should be shredded or disposed of in a secure manner.

Uttaran encourages staff to follow these practices consistently to safeguard personal data and ensure compliance with data protection requirements.

5.9 Data Breaches

Any Personal Data breach leading to the accidental or unlawful destruction, loss or alteration of – or to the unauthorized disclosure of, or access to – Personal Data transmitted, stored. In the event of a Data Breach, the Director will ensure there is an appropriate response which means:

- ✓ Establishing a team to investigate the Data Breach, and develop remedial plan.
- ✓ Informing the persons affected of the Data Breach without undue delay according to international or local regulations.
- ✓ Informing the relevant local authorities according to international or local Regulations.

In the event of a data breach, Uttaran will report the breach to the relevant regulatory


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authority within 72 hours of becoming aware of it. If the breach is likely to result in a high risk to the rights and freedoms of data subjects, Uttaran will notify the affected individuals without undue delay.

5.10 Reporting Data Protection Incidents

Uttaran takes data protection and information security incidents very seriously. All members and staff are required to promptly report any data protection or information security incidents that occur in relation to the processing of personal data. These include, but are not limited to:

- ✓ Unauthorized access to personal data or confidential information.
- ✓ Loss or destruction of personal data.
- ✓ Misuse of personal data or other violations of data protection laws.
- ✓ Data breaches (accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access).
- ✓ Phishing or malware attacks, abnormal activities, or any security vulnerability.
- ✓ Financial losses or fraud related to personal data.

5.9.1 Incident Reporting Procedure

- ✓ Notification: Incidents must be reported to the Data Protection Officer (DPO) via uttaran.head.office@uttaran.net or by direct communication within 48 hours of detection.
- ✓ Incident Form: A formal report must be completed, detailing the nature of the incident, affected data, and corrective actions taken.
- ✓ Investigation and Notification: The DPO will assess the incident and notify relevant regulatory bodies or data subjects if required within legal timelines.
- ✓ Final Report: A final report outlining the investigation findings, remedial actions, and any regulatory reporting should be completed and retained for compliance purposes.

5.11 Procedures, CVs, and other supporting documents

Application forms, CVs and supporting documents should not be printed, shared by email or kept on local drives. Copies temporarily down loaded on the local drives should be deleted (e.g. by clearing the internet browser cache and/or deleting from the "Download" directory or equivalent).

5.12 No commercial use of Personal Data

Uttaran does not make commercial use of Personal Data.

5.13 Data Transfer

5.13.1 External Data Transfer

Uttaran ensures that Personal Data is only transferred to jurisdictions or International Organizations that ensure adequate level of protection. Should it be necessary to transfer Personal Data to a Third Country or an International Organization that does not provide adequate level of protection, Uttaran will ensure that it maintains appropriate safeguards including Standard Contractual Clauses (SCCs), to ensure the protection of personal data.

When transferring Personal Data to a Third Party, Uttaran Personal Data Users must ensure that:

- ✓ The Recipient will apply a protection level equivalent to or higher than this Policy;
- ✓ Appropriate safeguards such as Standard Contractual Clauses (SCCs), are put in place where a Third Country or an International Organization does not provide adequate level of protection;
- ✓ Processing by the Recipient is restricted to the purpose authorized by Uttaran and;
- ✓ Data Transfer is compatible with the reasonable expectations of the Data Subject.

5.13.2 Data Transfer within Uttaran systems

for the sake of clarification, data transfer within Uttaran systems carried out between Uttaran personal data users in different Uttaran field offices or between different components of Uttaran are permitted and do not necessitate a written agreement provided the principles set out in this policy are respected.

5.14 Documentation of Processing

In order to demonstrate compliance with this Policy, Uttaran maintains records on the categories of Processing activities within its remit. Uttaran personal data users not using it tools and systems provided by the Uttaran should formally document such use and keep the documentation available for auditing purposes.

5.15 Penalties and Enforcement

Uttaran is committed to ensuring compliance with this Data Protection Policy. Any failure to adhere to the policy, including unauthorized access to personal data, failure to obtain proper consent, or failure to comply with data processing protocols, will result in disciplinary action.

5.12.1 Penalties for Non-Compliance

- ✓ Violations of this policy may lead to internal disciplinary measures, including warnings, suspension, or termination of employment or contractual agreements.
- ✓ In cases of severe breaches, such as unauthorized access or misuse of personal data, legal action may be taken as per the applicable laws, which may include fines, sanctions, or other penalties as determined by regulatory authorities.

5.12.2 Reference to Regulatory Bodies

- ✓ In the event of a data breach or failure to comply with the Personal Data Protection Ordinance 2025 (PDPO 2025), Uttaran will report the incident to the National Data Governance Authority (NDGA) as required by law.
- ✓ The NDGA is the relevant authority responsible for enforcing data protection regulations in Bangladesh, and Uttaran will fully cooperate with any investigations or actions taken by the NDGA.

6 Implementation

6.1 Accountability & Compliance

- ✓
- ✓ Uttaran is fully committed to ensuring that all activities related to the collection, processing, and management of personal data are carried out in compliance with this policy and relevant data protection laws. To uphold this commitment, Uttaran will conduct periodic reviews of its data protection practices to identify potential risks and areas for improvement. These reviews will be designed to enhance the organization's approach to data protection while also ensuring alignment with both national and

international standards.

- ✓ As part of this process, Uttaran will provide continuous training (subject to project scope, budget and operation scope) and awareness sessions for its staff to reinforce the importance of data protection principles. These sessions will be tailored to the specific needs of different projects and their respective operational contexts. Furthermore, Uttaran will work closely with its partners and stakeholders to ensure that all data processing activities are carried out with the highest levels of responsibility and transparency.
- ✓ Additionally, the organization will take proactive measures to address any compliance challenges and ensure that corrective actions are taken promptly when needed. This ensures that Uttaran not only meets regulatory requirements but also upholds the trust of its stakeholders and data subjects.

6.2 Effective implementation

Effective implementation of the serules is crucial to ensure that individuals are able to benefit from the protection afforded by them.

It is the responsibility of all Uttaran staff and Uttaran Personal Data Users to ensure implementation of the above principles.

6.3 Authorized Processing

Personal data processing should be in accordance with the purpose authorized by Uttaran in the course of executing professional duties.

Uttaran personal data users must not use Uttaran personal data for private or commercial purposes or disclose it to unauthorized persons.

6.4 Reporting of non-compliance

Allegations of non-compliance with this Policy should be reported using whistleblowing policy

6.5 Consultation and means of communication

Uttaran staff may consult with their line managers as applicable if unsure of any aspects of this Policy.

Personal Data requests from Data Subjects (e.g. for access, rectification or deletion of data) should be submitted using a request mail to uttaran.head.office@uttaran.net. Any Personal Data requests received via email or in hardcopy should be forwarded uttaran.head.office@uttaran.net. A response email will be sent to the Data Subject with a link to the online form asking the Data Subject to complete and submit it. Uttaran will ensure practical communication and training from time to time.

7 Amendment of the Policy

this policy has been published as part of the last governing board meeting and it will be reviewed after next 3 years. The effective date of this policy is 1st January 2026

8. Appendix

Appendix 1: Consent for Data Collection and Processing


Chairman
UTTARAN
House No-32, (1st Floor) Road No-10/A
Dhanmondi R/A, Dhaka-1209, Bangladesh


Secretary
UTTARAN
House No-32, (1st Floor) Road No-10/A
Dhanmondi R/A, Dhaka-1209, Bangladesh

This form should be used to obtain explicit consent from data subjects before collecting and processing their personal data. It is essential for any situation where personal data is being collected, including but not limited to staff, beneficiaries, donors, and other stakeholders.

Consent for Data Collection and Processing Form

Purpose: This form obtains consent for collecting and processing personal data in line with the Uttaran Data Protection Policy.

Personal Data Collection Consent Form

Uttaran is committed to protecting and respecting your privacy. We require your consent to process your personal data for specific purposes as outlined below. Please read and confirm your consent.

Full Name: _____
Email Address: _____
Phone Number: _____
Date of Birth: _____

Purpose of Data Collection:

- To process your application
- For communication regarding our programs
- To comply with legal obligations
- Other (please specify) _____

By signing below, you consent to the collection and processing of your personal data for the purposes indicated above. You have the right to withdraw this consent at any time.

Consent Confirmation:

- I consent to the collection and processing of my personal data as described above.

Signature: _____

Date: _____

Appendix 2: Consent for Use of Personal Data in Communications

This form should be used to obtain consent for using personal data for communication purposes (e.g., newsletters, project updates, or marketing). It is necessary for the collection and use of personal data in these contexts.

Consent for Use of Personal Data in Communications

Purpose: This form seeks consent for the use of personal data for communications, including newsletters, marketing, and program updates.

Consent to Use Personal Data for Communication

Full Name: _____
Email Address: _____
Phone Number (if applicable): _____


Chairman
UTTARAN
House No-32, (1st Floor) Road No-10/A
Dhanmondi R/A, Dhaka-1209, Bangladesh


Secretary
UTTARAN
House No-32, (1st Floor) Road No-10/A
Dhanmondi R/A, Dhaka-1209, Bangladesh

I agree to receive communications from Uttaran about:

- Newsletters and project updates
- Fundraising and donation requests
- Community activities and events

By checking the boxes above and signing below, you provide your consent for Uttaran to use your personal data for communication purposes, as described. You may withdraw your consent at any time by contacting uttaran.head.office@uttaran.net.

Consent Confirmation:

- I consent to the use of my personal data for communications as described above.

Signature: _____

Date: _____

Appendix 3: Consent for Data Transfer (If applicable)

If personal data is being transferred to third parties or jurisdictions outside Bangladesh, this form ensures that the data subject is informed and provides explicit consent for such transfers, particularly if data is transferred to international organizations or countries without an adequate level of protection.

Consent for Data Transfer Form

Purpose: This form ensures that data subjects are informed and provide consent for data transfer, especially across borders to jurisdictions with different data protection laws.

Consent for Data Transfer

Full Name: _____

Email Address: _____

Phone Number (if applicable): _____

Description of Data Transfer:

- My data will be transferred to a third country (outside Bangladesh) or an international organization.
- The transfer will be done in compliance with appropriate safeguards (e.g., Standard Contractual Clauses).

By signing below, you consent to the transfer of your personal data to the jurisdictions and parties described above. You may withdraw your consent at any time.

Consent Confirmation:

- I consent to the transfer of my personal data as described above.

Signature: _____

Date: _____


Chairman
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