

GLOBAL POLICY

ON DATA PRIVACY

Lead	General Counsel
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1. INTRODUCTION

Plan International collects and processes personal data through its many activities, including the personal data of children. Keeping this data protected is of utmost importance to all Plan International Entities in our global organisation. This Global Data Privacy Policy ("Policy") is established to protect this personal data and uphold individuals' right to privacy, while also enabling the organisation to use this personal data to support its mission.

Alongside this policy, the applicable laws in the countries where we operate must be followed when collecting and processing personal data. Where these applicable laws demand stricter protections for personal data, Plan International must comply fully and implement any additional policies and processes where needed.

Other Global Policies may also require extra measures to protect personal data, including the requirements described in the Global Policy on Safeguarding Children and Young People, which can be found [here](#).

1.1 SCOPE

This policy applies primarily to the collection and use of personal data. All types of personal data that are collected and processed by Plan International Entities are in scope of this Policy, as defined in Section 1.2. This policy does not apply to anonymous data, where the information cannot be used to identify a living person.

As a Global Policy, this policy applies to:

- Plan International, Inc. ("PII"), including its headquarters in the United Kingdom (operating through its UK subsidiary, Plan Limited), and all of its country offices, regional offices, liaison offices, and any other offices, some of which operate as branches and some as subsidiaries.
- All National Organisations ("NO" or "Member") that have signed a Members' Agreement and License Agreement with PII.
- All other entities that agree to be bound by the Global Policies.
(together, "Plan International Entities", also referred to as "we" or "us" in this document).

The principles and definitions in this policy also extend to relationships Plan International Entities have with third parties (including, without limitation, implementing partners, contractors and donors).

Each of the Plan International Entities, including PII, shall enact their own procedures, regulations or other regulatory documents that support compliance by its staff (and/or, when appropriate, contractors and other partners) with this Global Policy.

1.2 DEFINITIONS

In this policy the following definitions shall apply:

Applicable Law: an applicable law, rule, regulation, declaration, decree, directive, statute, or other enactment, order, mandate or resolution issued or enacted by any government entity (including any domestic or foreign, supra-national, national, state, county, municipal, local, territorial or other government), or applicable guidelines or principles issued by any governmental entity.

Data Controller: the person or entity which determines the purposes and means of the processing of personal data.

Data Processor: the person or entity which processes the Personal Data on behalf of the Data Controller.

Data Subject: the person whose personal data is subject to processing.

Personal Data: any data, including photographic data, IP address and location data that could be used on its own or together with other data to identify a living person. Certain types of Personal Data are considered Sensitive Personal Data, defined below.

Plan International or Plan International Entity: Plan International, Inc. Entities worldwide, including its subsidiaries (including International Headquarters) and country, regional and liaison offices (each a "Plan International Entity" and collectively, "Plan International") and National Organisations.

Plan International Staff: means employees of Plan International or Plan International Entity, whether employed on a full or part-time basis, and consultants.

Process or Processing: means any action performed on personal data, such as collection, recording, usage, sharing, storing, altering, erasing, or destroying.

Restriction of Processing: means the marking of stored Personal Data in order to limit its Processing under certain circumstances, including but not limited to, where an individual has objected to the Processing of their Personal Data by Plan International and Plan International is awaiting verification that it does have an alternative lawful basis for Processing that Personal Data.

Personal Data Security Incident: means a security incident that has affected the confidentiality, integrity or availability of personal data.

Sensitive Personal Data: Sensitive Personal Data typically includes any Personal Data in these categories:

- Information about children (i.e., individuals under the age of 18).

- Government-issued identifiers, such as social security numbers, driver's license numbers, and identification numbers.
- Financial details, such as account numbers, credit card numbers, or PIN numbers.
- Security information, such as a digital signature, biometric data, and passwords.
- Health information, such as information that would identify an individual's medications, medical treatments, diagnoses, or information relating to genetic characteristics.
- Protected personal characteristics: race, ethnicity, religion, and sexual preference.
- Geolocation information that identifies the precise street address or geographic coordinates (for example, latitude and longitude) of an individual.
- Information regarding union status, political opinions or criminal proceedings.

2. PURPOSE

The purpose of this Policy is to ensure that:

- Plan International upholds the privacy rights of all individuals (including, but not limited to, children and adults Plan International works with, sponsors, employees and third-party contractors) in respect of their Personal Data.
- Any Personal Data to which this Policy applies is appropriately collected, used, and maintained, shared and destroyed.
- Only authorised individuals can access Personal Data.
- Special consideration is given to personal data of children collected, used, and maintained, shared and destroyed.

Questions about this Policy should be directed to the Data Privacy Team: data.privacy@plan-international.org

3. POLICY STATEMENT

Data privacy is the fair and proper use of information about people. It is part of the fundamental right to privacy, a human right and a core value of Plan International as a rights-based organisation. With an increasing number of countries around the world passing data protection legislation, it has also become an essential compliance issue. But, on a more practical level, Data Privacy is about building trust between people and organisations. If we can keep personal data safe, people will feel confident about engaging with us. This is true for donors, employees, partners and the children and communities we serve. If we can operate consistently, securely, and efficiently within and across all Plan International Entities, we can be trusted.

The Global Data Privacy Policy aligns the data privacy approaches for all Plan International Entities. As part of Plan International's operations personal data flows across borders and different Plan International Entities. A consistent organisational approach ensures that personal data is treated with the same high standards in accordance with international best practice by every Plan International Entity with whom it is shared.

This global approach can increase our collective awareness and understanding of how personal data is governed and help embed a culture of data privacy in the organisation. It can further ensure that individuals take responsibility for data privacy and recognises data privacy as a fundamental human right and crucial to the way we work.

4. POLICY PRINCIPLES

Plan International's processing of personal data must comply at all times with this Policy and with applicable law.

4.1 CONTACT DETAILS

When personal data is collected from a data subject, Plan International shall ensure availability of the data controller's identity and contact information to the data subject. If applicable, the Data Protection Officer's contact information will also be provided.

4.2 FAIRNESS, LEGITIMACY AND TRANSPARENCY

Personal data shall always be processed in a fair, legitimate and transparent way. This means that Plan International shall only process personal data after a legitimate basis has been identified, and the data subject(s) have been provided with clear, easily understandable information about how their personal data will be used.

Plan International shall identify a legitimate basis before collecting and processing any personal data, including but not limited to:

Consent: the data subject has given informed, voluntary, specific, and unambiguous consent. Plan International will ensure any request for consent is separated from other information given to the data subject.

Legal Obligation: compliance with applicable law to which Plan International is subject.

Contract: performance of a contract.

Legitimate Interest: pursuing Plan International's legitimate interests, which must be balanced against the rights and freedoms of the data subject.

Plan International shall only collect and process sensitive personal data after obtaining a data subject's specific, unambiguous, informed, and voluntary consent, unless an applicable law allows otherwise.

When determining which legitimate basis is appropriate, Plan International shall always consider the circumstances of the data subject and the context of the data collection and processing.

4.3 PERSONAL DATA OF CHILDREN

- 4.3.1 Plan International shall have processes in place to ensure personal data about children is only collected and processed by the appropriate, authorised Plan International staff and third parties.
- 4.3.2 Plan International shall take extra care to ensure information provided to a child about processing their personal data is concise, easily accessible and uses clear and plain language.
- 4.3.3 Families will only be asked to provide personal data to Plan International after we have explained to them what will happen to the information they provide, and that participation in Plan International's programmes is voluntary. In general, a parent or guardian must consent to any collection by Plan International of personal data about individuals younger than 18 years old. However, there may be instances in which it is appropriate to lower this age. In such cases, Plan International must always obtain assurance that the individual is capable of providing informed consent, and ensure that the consent is fully informed and freely given.

- 4.3.4 In no case can personal data be collected for a child 13 years or younger without the consent of a parent or guardian.
- 4.3.5 Where possible, Plan International will seek to ensure that all Plan International Staff and third parties involved in the collection and processing of personal data understand the sensitivity of personal data about children and their families, and that they will only use this personal data for specific programming, influencing and fundraising activities.
- 4.3.6 Plan International's collection of personal data relating to sponsored children shall be undertaken according to 4.3.1 to 4.3.6 above, as well as the additional obligations stated in the Child Sponsorship Manual.
- 4.3.7 Where Plan International Staff believe the collection and processing of children's personal data raises safeguarding concerns, they shall report the concern according to local office procedures. Concerns may also be reported directly to an appointed Safeguarding Focal Point and / or to the Safeguarding Children and Young People Unit at Global Hub: safeguarding.unit@plan-international.org

4.4 PURPOSE SPECIFICATION & LIMITS ON SECONDARY USE

- 4.4.1 Plan International shall only collect and process personal data where necessary to serve specific, legitimate organisational purposes. Legitimate organisational purposes include, but are not limited to, fundraising, branding and communications, programming and influencing activities, human resources management, and meeting legal and other legislative requirements.

4.5 INFORMATION PROVIDED TO DATA SUBJECTS

Where possible, Plan International shall provide data subjects with the following information about the personal data it collects and processes relating to them, in a clear, easily understandable format. This shall be done when the personal data is collected, and shall include:

- The specific purpose for collecting and processing.
- The lawful basis for the processing.
- The data subject's rights in relation to their personal data.
- How the personal data will be stored and the length of time it will be held.
- Any disclosures of Personal Data to third parties.
- Other material information.
- The data controller's identity and contact information.

Where personal data is intended to be transferred to another country, the data subject will be informed of this, including the relevant safeguards in place to protect their personal data. Where applicable, these shall be stated in the Plan International Entity's Privacy Notice or relevant Consent Form.

4.6 DATA MINIMISATION AND ACCURACY

- 4.6.1 Plan International shall collect the minimum amount of personal data necessary to achieve specific, legitimate organisational purposes.
- 4.6.2 Where possible, Plan International shall take reasonable steps to ensure that personal data is kept up-to-date and accurate. Where inaccuracies are identified, they shall be corrected without undue delay.

4.7 DATA RETENTION AND DESTRUCTION

- 4.7.1 Personal data, whether stored electronically or on paper, shall be kept only as long as is necessary to fulfil the specified legitimate organisational purposes, then anonymised or destroyed safely.
- 4.7.2 Retention schedules shall be in place for all categories of personal data and compliance with these schedules maintained by the relevant business function.
- 4.7.3 Plan International Entities are required to have a Personal Data Retention Policy in place. For PII specifically, this shall be the Document and Data Retention and Deletion Policy, [here](#).

4.8 CONFIDENTIALITY AND SECURITY

All collection and processing of personal data shall be performed in a way that ensures appropriate confidentiality and security. Confidentiality and security shall be reviewed periodically and upgraded as necessary, to protect appropriately personal data.

- 4.8.1 The safeguards applied to personal data shall depend on many factors, including the available technology, the nature, scope, context and purpose of processing, as well as the sensitivity of the personal data.
- 4.8.2 Plan International will strive to ensure that personal data is processed only by authorised Plan International Staff or third parties, and that the processing is consistent with the roles and responsibilities assigned to such persons.
- 4.8.3 Plan International Entities are required to have an Information Security Policy in place. For PII specifically, this shall be the PII Information Security Policy, found [here](#)

4.9 PERSONAL DATA SECURITY INCIDENTS

- 4.9.1 Plan International shall implement safeguards, including the appropriate technical and organisational measures, designed to mitigate the risk of personal data security incidents.
- 4.9.2 All personal data security incidents must be reported in line with the relevant incident reporting process.
- 4.9.3 PII specifically shall adhere to the PII Incident Management Process, found [here](#)
- 4.9.4 Where required by applicable national law, Plan International Entities shall notify the relevant supervising authority and data subject(s) whose personal data was involved in the security incident.

4.10 PERSONAL DATA TRANSFERS

4.10.1 General

Transferring personal data is a necessary part of Plan International's operations. When transferring personal data, risks associated with the misuse or unauthorised disclosure of personal data must be mitigated.

Plan International shall only disclose personal data to third parties, including third-party service providers, where it has obtained informed and voluntary consent to such disclosure, or where disclosure is required or allowed by applicable law. The best interests and protection of a child

shall always override any consent to disclose personal data relating to a child previously obtained by Plan International.

Plan International may disclose Personal Data to third-party service providers acting on Plan International's behalf, provided that:

- a. Plan International has made appropriate disclosures (through a public-facing Privacy Notice or otherwise prior to collection) that personal data may be shared with service providers generally;
- b. Plan International has obtained from its service providers the assurances described in clause 4.10.3; and
- c. Where consent is used as the lawful basis for collecting and processing personal data, Plan International shall, where practically possible, ensure the data subject is aware of the transfer prior to the collection.

All transfers shall be reviewed for adherence with the Policy Principles in Section 4 of this policy.

4.10.2 Transfers to Third Party Service Providers

Before disclosing Personal Data to a third-party service provider, Plan International shall assess implementation by third-party service providers of appropriate controls designed to ensure that:

- a. the third-party service provider processes Personal Data in accordance with this Policy and Applicable Law, and only as instructed by Plan International;
- b. the third-party service provider maintains reasonable administrative, technical and physical safeguards that are designed to ensure the confidentiality, integrity and security of Personal Data;
- c. The third-party service provider returns to Plan International and / or destroys the transferred personal data upon request by Plan International; and
- d. The third-party service provider does not undertake onward transfers to other third parties without written permission from Plan International.

Where possible, written transfer agreements shall be in place stating the purpose(s) specified in the relevant contract.

4.10.3 International Transfers

Before transferring personal data (including personal data of Plan International staff) to a different country, Plan International will put in place appropriate safeguards to ensure that the protections afforded to the Personal Data in the country of origin will not be undermined in the country to which the Personal Data is transferred.

When cross-border transfers are expected at the time data is collected, Plan International will consider the purposes of such transfer and the requirements to make such a transfer, which may include checking:

- a. that appropriate contractual protections are in place;
- b. whether the data subject's clear consent to such transfer is needed; and
- c. informing the data subject of the consequences of their Personal Data being transferred to a different country.

4.11 TRAINING AND MONITORING

4.11.1 Plan International shall ensure that Plan International Staff receive periodic training on data protection principles, laws, and best practices, as well as the requirements of this Policy.

4.11.2 Plan International shall regularly monitor compliance with this Policy.

5. RIGHTS OF DATA SUBJECTS

Plan International shall respond to all requests regarding the rights of data subjects in a timely manner and apply easily accessible, clear and plain language.

5.1 RIGHTS OF ACCESS, CORRECTION AND DELETION

Plan International shall provide data subjects with reasonable access to, or information about, personal data relating to them, and maintain processes enabling data subjects to request the correction, restriction of processing or deletion of their personal data. Where applicable, these shall be stated in the Plan International Entity's Privacy Notice or relevant Consent Form.

5.2 RIGHT TO WITHDRAW CONSENT

Plan International will provide data subjects, including children and young people, with information about their right to withdraw their consent to the processing of their personal data.

5.3 COMPLAINT RESOLUTION

- 5.3.1 Plan International will strive to resolve any complaints relating to its processing of personal data promptly and fairly. Each Plan International Entity shall designate individual(s) to whom such complaints should be made.
- 5.3.2 Plan International will cooperate with data protection authorities and other regulators, agencies, and tribunals involved in resolving such complaints.

6. DATA PRIVACY BY DESIGN AND DEFAULT

6.1 DATA PRIVACY BY DESIGN

Plan International commits to building data privacy into processes, systems, projects or work activities that could have an impact on the privacy of individuals. A Data Privacy Impact Assessment can be used to ensure this is fulfilled. This assessment shall be made during the design phase of work and reassessed when substantial modifications are made to the work involving personal data. This shall align with the Safeguarding Standards, found [here](#).

6.2 DATA PRIVACY BY DEFAULT

Plan International adopts an approach to data privacy where the most data protective settings are the default and users should have to opt-in to any setting that presents greater risks.

7. RESPONSIBILITIES

Implementing and maintaining strong data privacy practices is an organisation-wide imperative for Plan International.

Each member of Plan International Staff shall be responsible for the protection of personal data and for complying with this Policy when processing personal data in connection with work activities.

Volunteers shall be responsible for the protection of personal data and for complying with this Policy when processing personal data in connection with volunteering activities.

Senior Plan International management shall be responsible for enforcing compliance with this Policy, including ensuring that Plan International staff, volunteers and third-party service providers are aware of and abide by this Policy.

Where necessary, Plan International will implement additional policies, procedures, or practices required to further the principles and goals set forth in this Policy, and to comply with applicable law.

8. CONTACT DETAILS

For any questions regarding this policy please contact data.privacy@plan-international.org.