



Subject: Policy on Personal Information Security

1. Definition

In this policy 'Personal Information' will refer to the information of the member beneficiaries, employees, partners and other stakeholders that is submitted to COAST through different forms, agreements, email or any other way during program or project implementation, service delivery or other purpose and that is preserved by COAST in printed or electronic files or in other format.

2. Scope of Personal Information

Personal information is basically the information by which an individual could be identified. This include:

- a. Name, address, phone number;
- b. Information about land and property, bank account, job or business information i.e. salary, designation, income, tax identification number, tax information;
- c. Photos
- d. Citizenship information i.e. National ID number, birth registration number, passport;
- e. Political identity;
- f. Physical and health information i.e. age, height, blood group, description of diseases;
- g. Family information i.e. names of father, mother, children, guardian and their information;
- h. Education information;
- i. Digital information including email address, location data, IP address, any digital account ID and password;
- j. Any other information which is collected by form fill-up or during any service delivery, verbal or written;
- k. Original and copies of them.

Information which are not used to identify an individual will not be considered as personal information. For example, registration number of business identity, web site address, statistics of an area where individuals are included.

3. Security of personal information

Security of personal information will refer to taking initiatives to provide protection of the personal information from its careless or intentional use that could cause any financial or social damage of that individual.

4. Objective of this policy

- a. To ensure the highest security of the personal information preserved at all branch, regional and principal office of the organization.
- b. To establish this security of personal information as a recognized human right and to practice it in the organization.
- c. To inform all concerned through this policy that COAST is committed to ensure security of personal information.

5. Method of developing this policy

The definition and scope is derived from analyzing different national and international laws and practices. Member participants and staff members from different level of the organization are directly consulted with about the existing and potential harms of the insecurity of the personal information. The types of personal information are identified and enlisted here.

6. Time of developing the policy

The policy was finally drafted through a process of open discussion and field test by 15 January 2019 and submitted to the meeting of the Board of Trustee for approval.


Rezaul Karim Chowdhury
Executive Director
COAST Trust


Begum Shamsun Nahar
Chairperson-Board of Trustee
COAST Trust

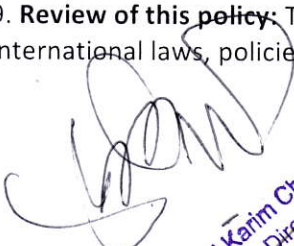


7. Policy

- 7.1 Cabinets or shelves with lock will be used to preserve the printed copies of the personal information files while the digital information will be kept in computers or tabs with passwords. Passwords and keys of the locks will be preserved by the office in charge and no outsider will have any access to those keys.
- 7.2 COAST will establish facilities for long-term preservation of the printed copies of information. For example, facilities to keep the documents free from rats or insects and moist. For the digital copies the computers should be kept virus free and a copy will be preserved in an external drive for long-term preservation.
- 7.3 Personal information or any part of it will not be handed over to anyone except the owner. With the proper permission of the owner a nominated person might have been given only the expected part of the information with a condition of its safe return to COAST office within a timeframe. In the case of minors, permission from their authorized guardians will be needed.
- 7.4 Personal information might have to be handed over to any designated authority by the order of the law enforcing agency or the court. In that case, COAST will inform the owner of the information beforehand. COAST will try to organize the handover in presence of the owner and not to provide information of other persons who is not involved. Example: Not to handover everyone's information to a designated authority when only one person's information is asked for.
- 7.5 COAST will be take necessary actions to ensure the personal information protection by complying with the applicable legislation of Bangladesh and will inform the person prior to providing the information. COAST will also inform the owner of the information that it is his/her right and COAST is committed to protect it.
- 7.6 If any initiative of protecting the personal information conflicts with any article of any law of the country then the law or court order will stand over the COAST policy. In that case, COAST will follow the law or the court order.
- 7.7 Personal information will not be included in the organization's Information Disclosure Policy. That means, information disclosure will not mean disclosing the personal information. However, if it is necessary to disclose any personal information, COAST will disclose this through the appropriate authority. In this case the owner of the information will be notified and will be asked to present in person.
- 7.8 The HR department of the organization will be able to see and examine the personal file of the staff or member-participant for the operational purpose. Prior approval of the Executive Director or the Director in the absence of ED will be needed if other departments of the organization need access to personal information. In that case the owner of the information will be notified.
- 7.9 External organization (e.g. Audit firm) will be able to access to the personal file for audit or regulatory purpose. However, they will not be allowed to copy any information without prior approval of the authority. Executive Director will be able to approve this after notifying the owner of the information.
- 7.10 The owner of the information will be able to access to his/her file and will be able to copy it at any time. S/he won't need any prior approval for this. S/he will be able to receive any of his/her own information by communicating with the in-charge of the office where his/her information is preserved. However, s/he will need the approval of the designated person of the organization if s/he wants to take the entire file away and s/he will need to submit an undertaking that COAST will not be responsible for protecting the information anymore once it is taken away.
- 7.11 COAST will take necessary action according to the HR policy if any staff or member-participant violates this policy. COAST will go to law enforcing agency if it is violated by any outsider.

8. Approved by The Trustee Board: This policy has been approved unanimously in the 99th BoT meeting held on 22 March, 2019.

9. Review of this policy: This policy can be reviewed with the significant changes made in the national and international laws, policies, conventions, human rights relating to this.


 Rezaul Karim Chowdhury
 Executive Director
 COAST Trust


 Begum Shamsun Nehar
 Chairperson-Board of Trustee
 COAST Trust