



AMNESTY INTERNATIONAL ZIMBABWE

DATA PROTECTION POLICY

PREAMBLE

As a matter of fundamental principle, Amnesty International Zimbabwe values data subjects' right to privacy. This policy highlights the organisation's commitment to comply with Zimbabwe's Cyber and Data Protection Act [12:07] and to safeguard personal data that it handles through laying out procedures on the collection, use, retention and disclosure of the same. Amnesty International Zimbabwe acknowledges the tremendous role personal data plays in the functions of the organisation. In the same vein, the organisation recognises the need for proper institutional data governance to align to the local data protection laws and global best practises.

PURPOSE

The purpose of this Policy is to provide a framework that manages the organisation's processing activities to align with Zimbabwe's data protection laws. This Policy shall be a useful guide which is standardised and equitable for management of data processing activities for Amnesty International Zimbabwe. The organisation's goal is to be a pioneer in creating a safe digital environment for its members, partners, employees and service providers.

1. Scope and Application

This Policy applies to the processing of personal data by the organisation in the course of its operations. It covers all categories of data subjects whose personal information is collected, used, stored, or shared, including but not limited to:

- Employees
- Board Members
- Human rights defenders
- Volunteers and activists

- Members and donors
- Website visitors
- Partners and affiliated organizations
- Contractors and service providers
- Victims and survivors of human rights violations
- Third parties handling personal data on behalf of Amnesty International Zimbabwe.

This Policy ensures compliance with the **Cyber and Data Protection Act [Chapter 12:07]** and applies to all personal data processed by the organisation, whether in digital or physical form.

2. Interpretation

2.1. In terms of this policy, the following words and terms shall bear the meaning as prescribed below;

“Data Controller” means any natural person or legal person who is licensable by the Authority including public bodies and any other person who determines the purpose and means of processing data.

“Data Processor” means a natural person or legal person, who processes data for and on behalf of the controller and under the controller’s instruction, except for the persons who, under the direct employment or similar authority of the controller, are authorised to process the data.

“Data Protection Laws” mean the Cyber and Data Protection Act, Regulations and Guidelines as may be promulgated by the Data Protection Authority.

“Data Protection Authority - (DPA)” means the Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ);

“Data Protection Officer” means an individual appointed by the data controller and is charged with ensuring, in an independent manner, compliance with the obligations set out in the Data Protection laws of Zimbabwe;

“Data Transfer” means a transfer of Amnesty International Zimbabwe’s personal data from the organisation to a processor;

“Consent” means a specific clear, freely provided, informed statement of will by which the data subject or his or her legal, judicial, or legally appointed representative accepts that his or her data be processed by a data controller.

“Personal data” means data relating to a data subject which can be used for their personal identification and includes names, addresses, telephone numbers, race, national or ethnic origin, colour, religious or political beliefs or associations, age, sex, sexual orientation, marital status, family status, fingerprints, blood type, healthcare history, educational, financial, biometrics, criminal or employment history among others.

“Custodian of the policy” means the individual department or persons at Amnesty International Zimbabwe with the fiduciary duty to oversee the implementation and review of this policy.

Other terms like, “sensitive information”, “Children” and “Processing” shall have the same meaning as assigned to them in the Cyber and Data Protection Act [Chapter 12:07] and in SI 155 of 2024, and their cognate terms shall be construed accordingly.

3. Guiding Principles

- Lawfulness, Fairness and Transparency
- Purpose limitation
- Accuracy
- Confidentiality and Integrity

- Storage minimisation
- Data minimisation
- Accountability

4. Guiding Legislation

4.1. The Cyber and Data Protection Act, [Chapter 12:07]

4.2. Statutory Instrument 155 of 2024 - The Data Protection Regulations

4.3. Cyber and Data Protection (Licensing of Data Controllers and Appointment of Data Protection Officers) Regulations, 2024 (SI 155 of 2024)

4.4. Cyber and Data Protection Implementation Guidelines on Licensing of Data Controllers 2025

4.5. Implementation Guidelines as may be provided or promulgated by the Data Protection Authority.

5. Custodian and Implementation

5.1. The Executive Director of Amnesty International Zimbabwe and the Data Protection Officer shall be the designated custodians of this Policy and they shall be responsible for the implementation of the same.

6. Categories of Personal Information Processed

- Name and Surname
- Address
- Identification Number
- Contact Details
- Biometric Information
- Health Status
- And other necessary information.

7. Legal Basis for Processing of Personal Data

Amnesty International Zimbabwe processes personal information based on the following legal grounds,

7.1. Consent

Consent is one of the lawful bases for Amnesty International Zimbabwe's processing of personal information. Unless otherwise authorised or empowered by other basis, Amnesty International Zimbabwe shall get explicit consent from data subjects before processing, or further processing and transferring personal data.

7.2. Legitimate interest

The organisation may share personal information of data subjects with other offices or entities within the Amnesty International global movement. Such sharing will be limited to information necessary for the fulfilment of the Organisation's legitimate interests in coordinating campaigns, advocacy, and communication activities, and in ensuring consistent engagement with individuals interested in human rights.

7.3. To fulfil a contractual obligation

If a data subject donates to the organisation or expresses an interest to join the movement, we will process the personal data provided to process that donation or action the membership request.

7.4. Legal obligation

The organisation shall process personal information to fulfil any legal obligations placed upon it, such as the prevention of fraud or money-laundering. The organisation shall process personal information if lawfully required to do so by a legal authority or a court of law.

7.5. Vital Interest of the data subject

The organisation may process personal data to protect the vital interests of the data subject or another individual. In instances where an individual applies for employment or a volunteer position with the organisation, the processing of certain personal information may be necessary to assess their suitability and to carry out recruitment-related procedures.

7.6. Security

The organisation takes appropriate security measures to ensure that personal information is kept secure, accurate, and up to date. Secure systems are also maintained for processing payments through trusted payment service providers. However, as the transmission of information over the internet cannot be guaranteed to be completely secure, the organisation cannot ensure the absolute security of information transmitted to its websites, despite taking reasonable precautions to protect it.

7.7. Third Party Websites

The organisation's website may contain links to third-party websites, applications, or embedded content. This Privacy Policy does not apply to those external pages or platforms, including websites or applications operated by Amnesty International or related entities and other third parties. Such sites are governed by their own privacy policies, which users are encouraged to review.

8. Purpose of processing Personal information

8.1. Amnesty International Zimbabwe collects personal information for the following purposes;

- To action your expression of interest in joining Amnesty International.
- To administer your membership of Amnesty International.

- To carry out due diligence for board members.
- To confirm your attendance to our trainings and activities.
- To fulfil employment obligations of staff members.
- To process donations that we receive from donors.
- To undertake email actions or compile petitions.
- To update the public on our campaigns and activities.
- To ask the general public to donate or get involved in our campaigns.

8.2. Sharing of Personal Information in Amnesty International Zimbabwe custody

Amnesty International Zimbabwe commits to:

- 8.2.1.** Restrict sharing of personal information outside the scope of its legitimate interest and lawful obligations except where clear concise consent has been given by the data subjects.
- 8.2.2.** Exercise maximum transparency, data subjects shall be advised and should consent to the sharing of the personal data.
- 8.2.3.** Ensure that there are data sharing agreements/ data processing agreements for every data processor.
- 8.2.4.** Ensure that personal data is processed securely and in accordance with this Policy to maintain the integrity and confidentiality of the data.
- 8.2.5.** Avoid storing or transferring personal information outside of Zimbabwe. However, if such need arises, no transfer of personal data shall take place to an organisation outside of Zimbabwe without due notice to the Authority and unless there are established adequate levels of protection in the said country to safeguard the personal information.

9. Storage and Retention Period of Personal Data

9.1. Amnesty International Zimbabwe shall retain personal data only for as long as necessary for the purposes set when it was collected and as set out in the organisation's Data Storage and Retention Policy.

9.2. Amnesty International Zimbabwe shall retain and use personal data to the extent necessary to comply with its legal obligations and in terms of applicable laws in Zimbabwe.

9.3. Data in use shall generally be retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the organisations' service.

9.4. The retention of records shall be implemented in light of the principle of storage minimisation and in accordance with the National Archives of Zimbabwe Act [Chapter 25:06].

10. Disclosure of Personal Data

10.1. Amnesty International Zimbabwe shall inform data subjects before their personal data is disclosed or transferred to another controller or processor.

10.2. Clear consent forms shall be used to establish lawful basis for the disclosure, transfer or any further processing.

10.3. Amnesty International Zimbabwe shall disclose its data subjects' personal data without a consent when required to do so by operation of the law or when required by public law enforcement authorities.

11. Rights of Data Subjects

11.1. In line with section 14 of the Cyber and Data Protection Act of Zimbabwe, Amnesty International Zimbabwe commits to respect data subjects' rights and the organisation is further committed to implement processes that safeguard the interests of its important data subjects.

11.2. Amnesty International Zimbabwe shall at all material times inform data subjects the purpose of processing activities at all intervals.

11.3. Data subjects shall have the following rights:

- Right to access to personal information,
- Right to correct or update personal information
- Right to be informed how their personal information is processed.
- Right to give or withdraw consent.
- Right to deletion of personal information.
- Right to object the processing of personal information
- Rights related to automated processing of personal information

12. Children's Personal Data and Privacy

12.1. Amnesty International Zimbabwe shall not process children's personal information.

12.2. Notwithstanding paragraph 12.1, Amnesty International Zimbabwe shall only process children's personal data if and when necessary, with the clear concise consent from the children's legal guardian.

12.3. Processing of children's personal data shall be done with due regard to the doctrine of best interests of the child.

13. Data Breach and Management

13.1. Amnesty International Zimbabwe shall report any suspected or actual data breach immediately to the Data Protection Officer (DPO) and Senior Management of the organisation as prescribed in the Data Breach Response Plan.

- 13.2.** Amnesty International Zimbabwe shall take appropriate technical and organisational measures that are necessary to protect data from negligent or unauthorised destruction, negligent loss, unauthorised alteration or access and any other unauthorised processing of the data as provided for under the CDPA.
- 13.3.** Technical measures put in place shall be implemented with specific consideration to the sensitivity of the personal information, risks involved in case of breach, availability of the data, transmission modes of data in use and in storage.
- 13.4.** Every person within the organisation is obligated to take precautionary measures to mitigate the risks of data breaches.