




**CHRIST IS THE
ANSWER MINISTRIES
[CITAM]**

DATA PROTECTION POLICY



			
DOCUMENT TITLE:	DATA PROTECTION POLICY (DPP)		
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CITAM DATA PROTECTION POLICY

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1. PURPOSE

The objective of this Policy is to cultivate organization-wide privacy culture to protect the rights and privacy of individuals; to comply with applicable privacy and data protection legislations by implementing privacy principles and controls in cooperation with the Information Security Management System.


NOTE 1 Employees should adhere and comply with this policy and additionally, specific privacy practices that may be adopted by CITAM.

2. OVERVIEW

On November 8th, 2019, Kenyan parliament assented The Data Protection ACT. An ACT to give effect to Article 319 (c) and (d) of the constitution; to establish the Office of the Data Protection Commissioner; to make provision for the regulation of the processing of personal data; to provide for the rights of the data subjects and obligations of data controllers and processors; and for connected purposes.

It is CITAM's policy to comply with the Data protection ACT within each jurisdiction in which a CITAM entity operates. The Data protection ACT and/or an individual's right to privacy are different from one jurisdiction to another. Specific privacy practices may be adopted by CITAM to address the privacy requirements.



			
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This Privacy Policy of CITAM (“**Policy**”) sets out the rules and procedures relating to the processing of Personal Data in Kenya

CITAM Data Protection Policy (hereinafter referred to as the “**DPP**”) have been approved by the Data Protection Commissioner to express CITAM’s commitment to establishing and maintaining high standards across the ministry for the transfer and processing of Personal Data. CITAM entities in Kenya and abroad are committed to adhere to the CDPP. The CDPP is designed to enable the transfer of Personal Data from CITAM entities located Kenya to CITAM entities located abroad, and in this regard, constitute CITAM’s global compliance program to Data protection Subject to Kenyan laws, the DPP shall govern the transfer/processing of personal data.


In addition, CITAM is implementing a global security and cyber security program to align security practices within the entire Ministry and to protect the ministry from any form of Data loss or leakage.

This Policy supersedes any previous communications, representations or agreements, verbal or written, related to the subject matter of this Policy.

3. DEFINITIONS

Personal Data means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, can identify such person.



			
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Processing refers to any action performed on Personal Data, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing, uploading, or deleting.

Sensitive Personal Data of a person, under The Data protection ACT of 2019, means such Personal Data which consists of information relating to:


- Password.
- Financial Information such as bank account or credit card or debit card or other payment instrument details.
- Physical, physiological, and mental health condition.
- Sexual orientation.
- Medical records and history.
- Biometric Information.
- Any other details relating to the above mentioned, provided by any person to CITAM for providing services.
- Any Information received pursuant to the above mentioned by CITAM for processing or storing such Information under a lawful contract or otherwise.

NOTE 2

Provided that any Information that is freely available or accessible in public domain or furnished under the Right to Information Act 2016 or any other law for the time being in force will not be considered as Sensitive Personal Data.

“**Employee**” means a CITAM current or former employee. As far as it applies to Employees, the Policy covers all stages of the employment cycle including recruitment and selection, promotion, evaluation, and training.



			
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“**Relevant Individual**” means an Employee, contractor and/or any other third party working on CITAM’s behalf and job applicants.

4. SCOPE COVERAGE

This Policy is applicable to all Personal Data collected, received, possessed, owned, controlled, stored, dealt with, or handled by CITAM in respect of a subject.

5. DETAILS


Personal Data and Information that CITAM handles for its clients, congregants, staff, Governance bodies (Deacon Board, Council of Elders) in the context of providing services, consulting, technology, and outsourcing services shall be processed according to the contractual provisions, specific privacy practices agreed upon with each client as applicable. This Policy lays emphasis on the obligations of the Relevant Individuals Ministry staff, Church volunteer workers and any other person within CITAM dealing with Personal Data during performance of their duties.

5.1 Collection of Personal Data by CITAM

Throughout the course of the relationship with the Relevant Individual, CITAM needs to collect Personal Data. The type of Information that may be collected includes (but is not limited to), where relevant:

- Basic Information regarding the Relevant Individuals such as name, contact details,




			
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address, gender, birth date, marital status, children, parents’ details, dependent details, photos, photo id proof, NSSF card, passport, voter ID, NHIF card, life insurance nominees/beneficiaries, fingerprint information, emergency contact details, citizenship, visa, work permit details.

- Recruitment, engagement, or training records including curriculum vitae, applications, notes of interview, applicant references, qualifications, education records, test results (as applicable).
- Information about the Relevant Individual’s medical condition – health and sickness records.
- The terms and conditions of employment/engagement, employment contracts with CITAM and/or previous employer.
- Performance, conduct and disciplinary records within CITAM and/or with previous employers; mobility records generated in the course of employment/work with CITAM.
- Information relating to the Relevant Individual’s membership with professional associations or trade unions.
- Leave records (including annual leave, sick leave, and maternity leave).
- Financial Information relating to compensation, bonus, pension and benefits, salary, travel expenses, stock options, stock purchase plans, tax rates, taxation, bank account, provident fund account details.
- Information captured as result of monitoring of CITAM assets, equipment, network owned and/ or provided by CITAM.
- Any other Information as required by CITAM.




			
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5.2 Purposes of collection and processing of Personal Data

CITAM may collect, process, and disclose Personal Data of the Relevant Individual for purposes connected with its business activities including the following purposes, hereinafter the “**Agreed Purposes**”:

- Managing the Relevant Individual’s employment/ work with CITAM including deployment/assignment of the individual to specific client projects.
- Record-keeping purposes; Payroll Administration, Payment of the Relevant Individual’s salary or invoice; Performance Assessment and Training.
- Compliance with a legal requirement/obligation; health and safety rules and other legal obligations; Administration of benefits, including insurance, provident fund, pension plans; immigration, visa related purposes.
- Background verification purposes; credit and security checks.
- Operational issues such as promotions, disciplinary activities, grievance procedure handling.
- Audits, investigations, analysis, and statistics, for example of various recruitment and employee retention programs.
- IT, Security, Cyber security, and Access Controls.
- Disaster recovery plan, crisis management, internal and external communications.
- For any other purposes as CITAM may deem necessary.



			
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CITAM only collects uses and discloses Personal Data for purposes that are reasonable and legitimate. Such Personal Data shall be processed in a manner compatible with the Agreed Purposes; unless the Relevant Individuals have consented to it being processed for a different purpose or the use for a different purpose is permitted by applicable law. There may be circumstances, when the Relevant Individual may have volunteered personal information and given explicit/fully informed consent to its processing (for example by submission of a Curriculum Vitae).

5.3 Limited Access to Personal Data

Only those Employees who “need-to-know” or require access to function in their role should have access to Personal Data. CITAM will not disclose Personal Data to any person outside CITAM except for the Agreed Purposes, or with the Relevant Individuals’ consent, or with a legitimate interest or legal reason for doing so, such as where CITAM reasonably considers it necessary to do so and where it is permitted by applicable law. In each instance, the disclosed Personal Data will be strictly limited to what is necessary and reasonable to carry out the Agreed Purposes.

When CITAM works with third parties who may have access to Personal Data while providing their services, CITAM contractually requires third party to process Personal Data only on CITAM’s instructions and consistent with CITAM’s Data Privacy policies and Data Protection laws.



			
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5.4 Disclosure and Transfer of Personal Data

CITAM may, from time to time, disclose and/or transfer the Relevant Individuals' Personal Data to third parties (including but not limited) listed below:

- CITAM donors, CITAM Missions, affiliate institutions and/or other business associates, CITAM's insurers and banks.
- External and internal auditors.
- Medical practitioners appointed by CITAM.
- Administrator of CITAM's mandatory provident fund scheme.
- Third parties who are involved in a merger, acquisition or due diligence exercise associated with CITAM.
- External companies or third-party service providers CITAM engages to perform Services on the Company's behalf.
- Third Parties provide certain information technology and data processing services to enable business operations.
- The applicable regulators, governmental bodies, tax authorities or other industry recognized bodies as required by any applicable law or guidelines of any applicable jurisdiction; and
- To any other party as deemed necessary by CITAM.

Notwithstanding anything contained elsewhere, any Personal or Sensitive Personal Data may be disclosed by CITAM to any third party as required by a Court of Law or any other regulatory or any other law enforcement agency established under a statute, as per the prevailing law without the Relevant Individual's consent.



			
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CITAM being a ministry that has its operations in other parts of the World it may transfer Personal Data for the Agreed Purposes described above to its own operations or to other assemblies or Mission fields located in other jurisdictions. Such transfer is justified on the basis that there is a “need-to-know” and it is reasonable and legitimate to allow CITAM Assemblies and businesses to operate effectively and competitively. Personal information is only transferred to another country, including within the CITAM only in as far as a reasonable level of data protection is assured in the recipient country and is acceptable within the laws of Kenya.

When using external data processors or transferring personal data to external third parties, CITAM shall enter into agreements with appropriate contractual clauses for protection of Personal Data and confidentiality including requirements to process the Personal Data only in accordance with instructions from CITAM and to take appropriate technical and organizational measures to ensure that there is no unauthorized or unlawful processing or accidental loss or destruction of or damage to Personal Data.

5.5 Retention and Deletion of Personal Data

It is CITAM’s policy to retain certain Personal Data of the Relevant Individuals when they cease to be employed/ engaged by CITAM. This Personal Data may be required for CITAM’s legal and business purposes, including any residual activities relating to the employment/engagement, including for example, provision of references, processing of applications for re-employment/re-engagement, matters relating to



			
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retirement benefits (if applicable) and allowing CITAM to fulfil any of its contractual or statutory obligations.

All Personal Data of the Relevant Individuals may be retained for periods as prescribed under law or as per CITAM policy from the date the Relevant Individuals cease to be employed/engaged by CITAM. The Personal Data may be retained for a longer period if there is a subsisting reason that obliges CITAM to do so, or the Personal Data is necessary for CITAM to fulfil contractual or legal obligations. Once CITAM no longer requires Personal Data, it is destroyed appropriately and securely or anonymized in accordance with the law.


5.6 Security of Personal Data

CITAM takes reasonable security measures to protect Personal Data against loss, misuse, unauthorized or accidental access, disclosure, alteration, and destruction. CITAM has implemented policies and maintains appropriate technical, physical, and organizational measures and follows industry practices and standards in adopting procedures and implementing systems designed for securing and protecting Personal Data from unauthorized access, improper use, disclosure, and alteration.

5.7 Accuracy of Personal Data

CITAM aims to keep all Personal Data as accurate, correct, up-to-date, reliable, and complete as possible. However, the accuracy depends to a large extent on the data the Relevant Individuals provide. An Individual may access much of his Personal Information online using various “self-service” HR applications deployed in CITAM. As such, Relevant Individuals must, agree to:



			
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- Provide CITAM with accurate, not misleading, updated, and complete Personal Data of the Relevant Individuals and/or any relevant person (including their consents to such disclosures to CITAM); and
- Up-date CITAM as and when such Personal Data provided earlier becomes incorrect or out of date, by providing new details.


5.8 Monitoring of Relevant Individuals’ use of Ministry network resources

CITAM may, from time to time, monitor the Relevant Individual’s use of Ministry premises, property, and network resources (including computer systems, e-mails, phone calls, and internet) primarily for following purposes:

- (i) facilitating business, securing personnel and property of CITAM; For example, some of the locations are equipped with surveillance cameras.
- (ii) maintaining a stable network environment for communications within CITAM, and communications with external parties.
- (iii) responding to any legal processes or to investigate any suspected breach of Relevant Individual’s obligations under this Policy or other CITAM’s policies or applicable law; and
- (iv) providing information to the CITAM’s management to ensure the proper utilization of CITAM’s resources.

This section is not meant to suggest that all employees will in fact be monitored or their actions subject to constant surveillance. It is meant to notify the fact that monitoring may occur and may result in the collection of personal information (e.g., using ministry network



			
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resources). When using ministry equipment or resources, employees should not have any expectation of privacy with respect to their use of such equipment or resources.

6 Data Protection Officer (Legal Officer)

Any questions, discrepancies, and grievances of the Relevant Individuals with respect to processing of Personal Data may be made to the CITAM Data Protection Officer (Legal Office) at legal@citam.org


The Legal Officer shall redress the grievances of the Relevant Individuals expeditiously and in any event within the period prescribed under law. In case of any queries regarding the content, interpretation, implications of this Policy the Relevant Individuals may contact the Legal Officer.

Notwithstanding the above, CITAM reserves the right to decline to process any such request which may jeopardize the security and confidentiality of the Personal Data of others, as well as requests which are impractical or not made in good faith, or the circumstances as provided for under the law permitting CITAM to refuse such request(s).

7 Employees/Relevant Individuals Obligations & Consequences of Violations

Every CITAM Employee/Relevant Individual, who deals with or encounters Personal Data regardless of its origin shall have a responsibility to comply with the applicable law and CITAM data privacy. The Employee/Relevant Individual should seek advice in the event of any ambiguity while dealing with Personal Data or in understanding this,




			
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Policy.

The Employee/Relevant Individual shall be diligent and extend caution while dealing with Personal Data of others, during performance of his/her duties and shall also,

- (i) Prevent any un-authorized person from having access to any computer systems processing Personal Data, and especially: (a) un-authorized reading, copying, alteration, deletion, or removal of data; (b) un-authorized data input, disclosure, uploading, transmission/transfer of Personal Data.
- (ii) Abide by CITAM internal logical and physical security policies and procedures.
- (iii) Ensure that authorized users of a data-processing system can access only the Personal Data to which their access right refers.
- (iv) Keep a record of which personal data have been communicated, when and to whom; Not to provide any Personal Data to any third party without first consulting with his/her supervisor (SP, RO, HOD, HOU) or the Human Resources Department.
- (v) Ensure that Personal Data processed on behalf of a third party (client) can be processed only in the manner prescribed by such third party.
- (vi) Ensure that, during communication of Personal Data and transfer of storage media, the data cannot be read, copied, or erased without authorization.
- (vii) Immediately, on becoming aware report and notify any vulnerabilities and privacy related breach/security breaches (including potential risks).
- (viii) Attend mandatory and voluntary trainings on security and data privacy including e-learnings and online sessions.



			
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Failure to comply with the Policy/ the DPP and applicable laws may have serious consequences and can expose both CITAM and the Employee/Relevant Individual to damages, criminal fines, and penalties as per section 62 of the Data Protection ACT of 2019.

It is important to note that any non-compliance with this Policy/DPP is taken very seriously by CITAM and may lead to initiation of appropriate disciplinary actions including but not limited to Employee dismissal or Relevant Individual termination of contract or reporting to the authorities.

Note 3: CITAM reserves the right, to amend this Policy from time to time.

8 DISTRIBUTION LIST

This policy shall be distributed to all CITAM staff, Service providers and all other relevant persons.

9 RESPONSIBILITIES


9.1 Supervisors/HODs (Senior pastors, Managers, Principals)

- Ensure safety of data in their possession
- Report any act against this policy by the subordinates.
- Develop mechanisms that promote protection of the third-party data.
- Shall protect customers data.
- Receive complaints of data mismanagement and reports to the legal office.
- Provide data under their care when requested as per this policy.
- Promote the adherence of this policy among the subordinates.

9.2 Legal Officer (Data Protection Officer)

- Shall ensure that this policy is adhered to.
- Shall guide the organization in the implementation of this policy.



			
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- Shall receive any complaints regarding violation of this policy.
- Shall represent the organization on any legal process involving breach of Private Data.

9.3 ICT Staff

- Shall educate staff on management of staff accounts and system accounts.
- Shall organize awareness training from time to time on cyber threats and privacy.
- Shall attend to any staff through the ICT Help Desk on matters related to system access and passwords.

9.4 All staff

- Use data under their care responsibly.
- Adhere to this policy.
- Report any activity that goes against this policy.


10 HANDLING COMPLAINTS AND CONCERNS

All complaints related to Data Privacy shall be directed to the Legal officer who will advise the ministry on the way forward.

11 TRAINING

All the staff shall be from time to time be trained on data handling and Data Privacy as per this policy. Staff who get in touch with sensitive data of employees, Congregants, Students, and other related parties shall get an in-depth training on this policy.



			
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12 APPLICABLE REFERENCES

- CITAM by laws
- Data Protection ACT 2019
- Access to Information ACT 2016
- Kenya Information and Communications Act 1998
- Basic Education Act 2013
- Employment Act 2007
- Kenya National Examination Act
- ISO 9001: 2015 Clause 8.5.3