

# HELP LESOTHO PRIVACY POLICY 204-25

## 1. OBJECTIVE

The objective of this policy is to protect the privacy and security of personal information collected, used, stored, or shared by Help Lesotho in Canada and Lesotho. Help Lesotho is committed to transparency, accountability, and compliance with all applicable privacy laws, including the *Personal Information Protection and Electronic Documents Act (PIPEDA)* in Canada and the *Data Protection Act (2022)* in Lesotho.

## 2. DEFINITIONS

**HL** refers to Help Lesotho, an incorporated not-for profit-organization with charitable status.

**Board** refers to the Board of Directors of Help Lesotho.

**Staff** refers to the staff of HL.

**Volunteers** refers to individuals who contribute time and/or services to Help Lesotho without remuneration.

**Donors** refers to individuals, corporations, or organizations that provide financial or in-kind support.

**Beneficiaries** refers to individuals or families who benefit from Help Lesotho's programs.

**Personal Information** refers to any information that can identify or be linked to a specific individual, but excluding publicly available or business contact information.

**Sensitive Personal Information** refers to includes health, financial, biometric, or other data that could cause harm if disclosed.

**Third-Party Processor** refers to an external organization or service provider handling personal data on behalf of Help Lesotho.

## 3. POLICY STATEMENT

Help Lesotho is committed to protecting the privacy of the personal information of its employees, volunteers, board members, beneficiaries, donors and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that they choose to share with us.

Help Lesotho respects the privacy of its stakeholders and is committed to handling all personal information responsibly and securely. This includes:

### 3.1 Consent

- Help Lesotho collects and uses personal information only with express or implied consent, except where otherwise permitted by law.
- Consent may be withdrawn at any time, subject to legal or contractual restrictions.

### 3.2 Limited Collection

- Only information necessary for Help Lesotho's programs, operations, and reporting will be collected.
- Data collection will be fair, lawful, and transparent.

### 3.3 Use, Disclosure, and Retention

- Personal information will be used only for the purpose for which it was collected or as required by law.
- Information will be retained only as long as necessary and then securely destroyed as required.

### 3.4 Accuracy and Access

- Help Lesotho will maintain personal information that is accurate, complete, and up-to-date.
- Individuals have the right to request access to, or correction of, their personal information.

### 3.5 Security Safeguards

- Help Lesotho uses administrative, physical, and technical safeguards, including:
  - Encryption for stored and transmitted data.
  - Multi-factor authentication and password protection.
  - Role-based access control to confidential systems.
  - Secure disposal (digital deletion and shredding) of obsolete data.
- Confidentiality obligations continue after an individual's relationship with Help Lesotho ends.
- Help Lesotho's employees are made aware of the legal obligations of maintaining the confidentiality of such personal information.

### 3.6 Disclosure of Personal Information about Donors

HL collects personal information about donors and prospective donors for the following purposes:

- Conducting and facilitating fundraising,
- Managing our relationship with donors; and
- Meeting any legal or regulatory requirements relating to the activities of HL.

HL will not disclose any personal information about a donor or prospective donor to anyone outside HL or any of its affiliated entities without the knowledge or consent of that donor or prospective donor except as follows:

- To an auditor in connection with an audit of HL conducted by its auditor;
- To an organization or individual providing services to HL where the personal information is reasonably required in the performance of those services, provided that contractual or other arrangements are made to ensure that any such organization or individual acts in a manner consistent with this Policy and uses such personal information solely for the purpose of providing services to HL or on its behalf in a manner consistent with HL's instructions. Contractual arrangements with organizations or individuals providing services will prohibit forward sharing of personal information;
- To a lawyer who is representing HL in a matter to which the personal information relates;
- To comply with a subpoena, warrant or requirement under an order or rule of court;

- To a government institution that has made a request for the information, identifying its authority to do so, in connection with the administration of any law of Canada or a province; or
- In any other circumstance where disclosure is specifically required under any applicable personal information protection legislation.

### **3.7 Program Participant and Beneficiary Information**

Help Lesotho collects and uses personal information about program participants, including names, demographic details, photographs, videos, stories, and participation records, solely for the purpose of delivering, evaluating, and communicating the impact of its programs.

HL obtains consent (written or verbal) from participants—or from parents/guardians for minors—before collecting or sharing any identifiable information, photos, or stories.

HL does not disclose participant information to external parties without explicit consent, except where required by law or donor reporting agreements.

Program participants and beneficiaries may request that their image or information be removed from HL publications or online platforms at any time by contacting the Program Director.

Storytelling Ethics include:

- Images must reflect dignity, not pity or vulnerability.
- Photographs and testimonials are used respectfully and only in ways that uphold the dignity and privacy of participants.
- Group photos require general consent.
- Staff and volunteers may not post photos of participants on personal social media.

### **3.8 Data Breach Response**

In the event of a data breach, HL's Executive Director will:

1. Contain and investigate the incident.
2. Notify affected individuals and, if applicable, regulatory authorities.
3. Implement corrective and preventative measures.

The Executive Director is required to immediately notify the Board of Directors of a breach.

### **3.9 Complaints and Inquiries**

- Individuals may contact the Privacy Officer (see Section 4) to make complaints, inquiries, or access requests.
- Complaints will be investigated promptly, and responses provided in writing. Complaints will be managed through the process set out in Help Lesotho's External Complaints Policy.

## **4. ROLES & RESPONSIBILITIES**

**4.1** The Privacy Officer (Executive Director) is responsible for implementing and monitoring compliance with this policy, investigating complaints, and reporting annually to the Board.

**4.2** The most Senior Manager in Lesotho is responsible for ensuring compliance with local data protection laws in Lesotho.

**4.3** All staff, volunteers, and Board Members must protect personal information and report any suspected data breaches or unauthorized disclosures immediately to the Executive Director.

## **5. COMMUNICATING THIS POLICY**

**5.1** This policy will be posted on Help Lesotho's website and shared with all stakeholders.

**5.2** A privacy notice will be posted on Help Lesotho's website.

**5.2** All staff, volunteers, and Board members will receive annual privacy and data protection training.

**5.3** Contractors and third-party service providers must sign confidentiality agreements before handling Help Lesotho information.

## **6. REVIEW & EVALUATION OF THIS POLICY**

**6.1** This policy will be reviewed every three years or sooner if required by legislative or operational changes.

**6.2** The Board will document its review and any revisions.

## **7. DATE OF ENACTMENT**

This policy was adopted by the Board of Directors of the HL at a duly constituted meeting on April 25, 2013. The Board subsequently reviewed and approved this policy on November 21, 2022 and December 3, 2025.