



## **Privacy Policy – July 2022**

**State of Policy: Approved**

**Policy Approved By: BoT**

**Signature: CA**

**Overall Responsibility for the Policy:** The Board of Trustees

**Persons responsible for implementing the policy:** COO

**Policy Applies To:** All Trustee, employees, volunteers and as a guide to supporting partners and stakeholders.

**Date of next review: July 2023**

### **Background:**

1. **COMPASS-Ghana** exists for the benefit of the public, the advancement of health by supporting the development of palliative care in Ghana and the surrounding region, in particular, but not exclusively, by:
  - (a) improving access to, and the quality of, palliative care in order to relieve the sickness, suffering and distress of people at the end of their lives;
  - (b) promoting education and research in, and advancing clinical knowledge of, palliative care, with a particular focus on resource-poor communities;
  - (c) providing or facilitating education and training in palliative care for patients, families and caregivers in order for them to become as self-reliant as reasonably practicable in their interventions and care; and
  - (d) supporting other organisations and institutions in Ghana and the surrounding region, which are involved in palliative care, in such ways and such manner as shall be exclusively charitable.
2. The scope of the charity will include the patient (Child to Adult), their families, dependants, caregivers and communities and will work alongside and support conventional agencies
3. **COMPASS-Ghana** offers care and support to patients and their families across Ghana during the most difficult of times. At the very centre of this are our supporters, who give so much to help make every day the best day possible for patients and their families. We value your support and we take your privacy very seriously; we are committed to ensuring that your privacy is protected.
4. We promise to respect any personal data that you are happy to share with us or allow other organisations to give to us. This policy explains how we use any information we



collect about you, and how we have put procedures in place to meet our legal obligations and ensure that we protect your privacy.

## Section One: Scope of Policy

5. This Privacy Policy applies to non-healthcare activity of COMPASS-Ghana, including your use of our website [www.compass-gh.org](http://www.compass-gh.org), and covers:

- ✿ Important information and who we are
- ✿ The data we may collect about you
- ✿ How and why we collect your personal data
- ✿ How we use your personal data
- ✿ Who we share your data with and why
- ✿ International transfers
- ✿ Keeping your personal data secure
- ✿ Length of time we keep your personal data
- ✿ Your rights regarding your data
- ✿ Definitions

## Section Two: Patients, Families and Caregivers

6. Why do we collect personal information about patients, families and carers and how do we use it?

7. Personal information about patients, including information about other health and social care professionals and family and friends involved in providing support and care, is essential in enabling us to provide the care required and to ensure that the needs of patients and their family members and caregivers (ie close friends) are at the centre of all the care we provide. The lawful basis for collecting and using information to provide care to our patients, families and carers is defined as a "public task" ie the information is fundamentally necessary for us to provide our care. The fact that we are providing health and social care permits us to handle sensitive personal data.

- ✿ This lawful basis permits us to:
- ✿ Co-ordinate the care that we offer — both within **COMPASS-Ghana** and externally
- ✿ Offer wider support to a patient's family members, including in bereavement
- ✿ Provide information to the Ghana Health Service and Ghana Ministry of Health and other commissioners with whom we hold service contract
- ✿ Audit, evaluate and develop our services.
- ✿ Different levels of information are held depending on the extent of COMPASS-Ghana's input.

8. **What personal information do we collect about our patients, families and carers?**  
Based on the data processing reasons outlined above, we may collect all or some of the types of information below to help us provide the best care possible:



- ✿ Basic details including name, postal/email address, telephone number, date of birth/death.
- ✿ Demographic, equality and diversity data
- ✿ Medical information including NHS number, detailed medical records, prescribed medications; investigation results and information from other professionals involved in care, patient/client service activity.

9. Other information includes personal and social history and documentation of consultations. Interactions with family members/carers are usually recorded within the patient's record, but if a family member or caregiver is receiving more involved support from **COMPASS-Ghana** then a record will be created in their own right as a 'client' record — we will ensure that they are aware of this.

10. Some people will only attend Community group sessions, using community programmes that will promote open access, but we are still providing a health and social care service. We therefore create a record for each person who attends one of these groups in which we are operating or represented and we will update this with attendances and any relevant clinical notes.

11. **Where does COMPASS-Ghana store patient, family and carer's information and for how long?** Patient and 'client' data will be stored on our electronic patient record system. This is a secure clinical database used by the GHS. Details of specific host and pertaining regulations -on request. *(To be amended once COMPASS-Ghana NGO, established in Ghana)*

12. Under UK current data protection legislation, all organisations involved in a patient's care have a duty to ensure that information held about them is accurate, up to date and kept secure at all times. Access to records can be audited and can always be traced back because users log in using unique identifiers and secure access methods.

13. Access within the **COMPASS-Ghana** team is on a need-to-know basis. Where volunteers are providing care and support they are regarded as part of the **COMPASS-Ghana** team. All staff and volunteers with access to confidential personal information receive information governance training.

### **Section Three: Using cameras or other recording equipment during treatment and care**

14. At **COMPASS-Ghana** we promote the open and honest recording of consultations of conversations with healthcare professionals.

15. Where this is done with everybody's agreement, we believe this benefits the patient and the healthcare professional by:

- ✿ enabling patients to remember important advice, particularly where there are language barriers



- ✿ providing a copy of the consultations when patients may have been distressed giving patients more time to process information
- ✿ helping patients and their family members where patients may be experiencing memory loss or have some cognitive impairment
- ✿ including patients' family members in their care and decision making helping patients to remember if the information is particularly complex.
- ✿ helping to set family member's mind at ease about the care received or even help identify poor care or abuse.

16. To achieve this, we will work with you to ensure that:

- ✿ any recording is done openly and honestly with the express permission of the patient
- ✿ the recording process itself does not interfere with the consultation process or the treatment or care being administered
- ✿ the patient understands that a note will be made in their health record stating that they have recorded the consultation or care being provided
- ✿ the patient is reminded of the private and confidential nature of the recording and that it is their responsibility to keep it safe and secure
- ✿ any recording is only made for personal use
- ✿ you are aware that the misuse of a recording may result in criminal or civil proceedings
- ✿ you understand that the patient is entitled to see their notes
- ✿ we can consider providing the patient with a written record summary, and or a verbatim record (if practical) of their consultation for their own personal use if this is helpful.

17. **COMPASS-Ghana** is aware that patients and families may be considering covertly recording a consultation. **Using a hidden camera or other recording equipment is a big decision.** It can affect people's privacy and dignity. And it can have legal consequences as well. It may also be interpreted as a sign that trust is lacking or that the patient may be considering a complaint or legal action.

18. Both legally, and as a matter of courtesy, you should seek the health professionals' agreement before recording a consultation/treatment. **We strongly discourage** covert recording.

19. If you are worried about yours or somebody's treatment and/or care, you should first raise these concerns with us. We take proactive steps to investigate and address any issues regarding your treatment and care. You can do this by using our complaints procedure.

#### **Section Four: Sharing personal information about patients and clients with third parties**

20. **COMPASS-Ghana** works as part of a health and social care system in the community. To provide the safest, highest quality, most integrated patient and client care we can, the active intelligent sharing of health and social care information is encouraged, whilst



confidentiality is prioritised. We believe that you would expect us to share relevant health and social care information with other services / organisations involved in your care, or those who you have agreed should become involved and you will inform us if you do not wish for this to happen.

21. We do not generally share information about clients, or those who only attend our Initiatives in the community, but for patients, we would anticipate sharing information with; as part of your care are:

- ✿ Community care professionals eg GPs, Community Nurses, multi-disciplinary teams, Specialist Nurses, Community Matrons.
- ✿ Hospitals
- ✿ Public/private health and social care providers.

22. Although we would always aim to share only the minimum information required, please tell us if there are particular areas that you wish to remain confidential. Patients do have the right to totally opt out of COMPASS-Ghana sharing their electronic patient record with other health and social care providers.

23. Very rarely we may be required to share confidential personal information without consent if we are required to do so by statutory law, such as with safeguarding concerns. We are required to share information for commissioning, service planning and regulatory purposes with:

- ✿ Clinical commissioners of local services
- ✿ Care Quality Commission and other regulatory bodies.

24. We will ask, specifically, for your consent (lawful basis) if personal data is to be used if:

- ✿ Referring our patients/clients on to other service providers (non-health/social care)
- ✿ Requested by solicitors or insurance companies.

25. In order for us to raise awareness of our work it is extremely useful to be able to use stories and photographs/video of our patients and their families. We will only ever do this with your specific consent (lawful basis).

## **Section Five: Privacy of our donors and supporters' information**

26. **COMPASS-Ghana** collects and processes your personal data through your use of our website, including any data you may provide through this website when you sign up to a mailing list, comment on an article, purchase a product, engage with a service, make a donation, or take part in a competition or survey.



27. This website is not intended for children and we do not purposefully collect data relating to children except where it is provided by, or with the explicit consent of, their legal guardian.

28. It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

29. Data Controller: **COMPASS-Ghana** is registered as a data controller with the Information Commissioner's Office and is registered with the Fundraising Regulator.

30. We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy or related privacy notices. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO.

✿ Data Protection Officer: John Davies — Chief Operating Officer Email  
john.davies@compass-gh.org

"Sweetlands"  
58 Monkton Farleigh  
Bradford on Avon  
Wiltshire  
BA15 2QN

31. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). **COMPASS-Ghana** would, however, appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance.

32. **Changes to the Privacy Policy:** Although we endeavour to ensure this Privacy Policy is maintained and up to date, there may be instances where legislative changes (UK or Ghana) are yet to be satisfied. Where any part of this policy becomes invalid or inappropriate due to these changes, it will be the provision within the relevant regulation that will apply but this will not affect the validity of any remaining terms.

33. **Your duty to inform us:** It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



34. **Third-party links:** **COMPASS-Ghana's** website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

35. **Social media:** Where **COMPASS-Ghana** operate a social media page or channel and it is identified that we have a responsibility for your personal data as either a controller or joint controller with that social media website, we will make this clear to you via a privacy notice.

### **Section Six: The data **COMPASS-Ghana** may collect about you:**

36. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (known as anonymous data).

37. COMPASS-Ghana may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- ✿ Identity Data includes first name and last name. **COMPASS-Ghana** may ask for further identity data (such as title, marital status, date of birth and gender) but only in situations where we believe this can enhance your experience and interaction with us.
- ✿ Contact Data includes correspondence addresses, email address and telephone numbers.
- ✿ Financial Data includes bank account and payment card details.
- ✿ Transaction Data includes details about donations and payments from you and other details of products and services you may have purchased from us.
- ✿ Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- ✿ Profile Data may include the history of purchases made by you, your interests, preferences, feedback and survey responses.
- ✿ Usage Data includes information about how you use our website, products and services.
- ✿ Marketing and Communications Data includes your preferences in receiving marketing products from us and our third parties, and your communication preferences.
- ✿ Still and moving images includes video footage and photographs taken at our events at which you might be present and visible. Where this takes place there



will be clear signage indicating such with further information as required.  
**COMPASS-Ghana** may also ask for your consent in certain specific circumstances.

38. **Aggregated Data:** **COMPASS-Ghana** also collects, uses and shares Aggregated Data, such as statistical or demographic data for any purpose.

39. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

40. **Special Categories (of personal data):** Other than as part of our recruitment process or for **COMPASS-Ghana** service users, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation or behaviours, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions or offences.




41. For more information on the Special Categories of Personal Data collected as part of a recruitment process, please refer to the privacy notice provided to you at the point of application,

### Section Seven: Failure to Provide Personal Data

42. If you fail to provide personal data, where we need to collect personal data by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods you have purchased from our online retail operation, or to process your enrolment on a fundraising event or clinical training course). In this case, we may have to cancel a product or service you have with us, and we will notify you if this is the case at the time.

### Section Eight: How and why **COMPASS-Ghana** collect your personal data:

43. We use different methods to collect data from and about you including through:

-  Direct Interactions
-  Automated technologies or interactions
-  Third parties or publicly available sources

44. **Direct interactions:** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:





- ✿ make a donation
- ✿ apply for our products or services
- ✿ sign up to an event or training course
- ✿ volunteer for us
- ✿ subscribe to our service or publications
- ✿ request marketing products to be sent to you attend events at which your image might be captured in video or still image
- ✿ enter a competition, promotion or survey
- ✿ or give us some feedback

45. Automated technologies or interactions: As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.

46. Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below:

- ✿ Via one of our fundraising partner organisations such as “Go Fund Me” or JustGiving
- ✿ Technical Data from the following parties:
  - a. analytics providers (such as Google)
  - b. advertising networks
  - c. search information providers
- ✿ Identity and Contact Data from publicly available sources, such as social media (when you engage with our social media channels such as Facebook, Instagram, Twitter, LinkedIn or YouTube)
- ✿ Identity, Contact, Transaction and Profile Data from publicly available sources, such as:
  - a. other charity websites and annual review
  - b. corporate websites, public social media accounts, the electoral register,
- ✿ Charity Commissioner
- ✿ Companies House registers.
- ✿ Registrar Generals Office Ghana

47. As part of an effort to better understand our supporter networks and inform fundraising strategies (see below for more information on fundraising).



48. Where information is received or likely to be received from third parties or publicly available sources, we will communicate this to you at the earliest opportunity through either a privacy notice or other communications.

### Section Nine: Fundraising

49. Our work at **COMPASS-Ghana** is only made possible thanks to the generosity of our supporters, so it's vital that our fundraising efforts are as effective as they can be. By developing a better understanding of our supporters through research, using publicly available sources, we can tailor and target our fundraising events and communications (including volunteering opportunities) to those most likely to be interested in them.

50. This allows us to be more efficient and cost-effective with our resources. It enables us to present relevant information about projects, products and services, and conversely reduces the risk of someone receiving information that they might find irrelevant, intrusive or even distressing.

51. We only use reputable sources where someone would expect that their information may be read by the public. We avoid any data that we believe has not been lawfully or ethically obtained, and we do not use information sources which have not been broadcast or made public.

52. We're committed to ensuring you remain in control of how your information is used and you're entitled to object to this activity at any time by emailing ([info@compass-gh.org](mailto:info@compass-gh.org). — to be set up on registration)

### Section Ten: How does **COMPASS-Ghana** - use your personal data?

53. We only use your personal data when the law allows us to. Most commonly, we use your personal data in the following circumstances:

- ✿ Where we need to perform the contract, we are about to enter into or have entered into with you (for example, if you've purchased goods from our online retail operation, or have signed up to a training course or fundraising event).
- ✿ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ✿ Where we need to comply with a legal or regulatory obligation.

54. Generally, we only rely on consent as a legal basis for processing where no other lawful basis exists. This includes the sending of unsolicited general marketing (i.e. marketing not related to an existing relationship or a previous interaction with us) or third-party direct marketing communications to you via email or text message.



55. You have the right to withdraw consent to marketing at any time by emailing (details on registration)

56. We ask for your information so that we can:

- ✿ process your donation or support your fundraising efforts
- ✿ thank you for your donations and support
- ✿ process and record Gift Aid and a related agency agreement
- ✿ identify event participants and volunteers, and manage their needs and expectations to create a memorable experience ✿ send you information you have asked for
- ✿ keep a record of your relationship with us
- ✿ provide you with any products, services or information you request from us
- ✿ manage how you would like to receive information and news from us, and what information you would like to receive
- ✿ understand how we can improve our fundraising and marketing services, products or information
- ✿ provide you with information that we think you would like to receive, based on your relationship with us and what you have told us is of interest to you
- ✿ invite your feedback or engagement with a particular matter
- ✿ We may also use this information to undertake data analytics to understand and improve our website, supporter database, products/services, marketing, customer relationships and experiences.

57. We will use the information processed about you to identify the most efficient, effective and appropriate way to interact with you. This means we may use your previous interactions with us to determine what **COMPASS-Ghana** activities are most relevant to you. We will adhere to the marketing preferences that you have provided us with, and we always welcome feedback on whether or not we're getting this right.

58. **Third-party marketing:** We will get your express opt-in consent before we share your personal data with any company outside of **COMPASS-Ghana** for marketing purposes.

59. **Cookies:** You can set your browser to refuse all or some browser cookies, or to alert you when websites use cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information on cookies, please refer to our Cookie Policy.

60. **Change of purpose:** We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact (Details on registration)

61. If we need to use your personal data for an unrelated purpose, we will notify you and either explain the legal basis that allows us to do so, or request your consent to do so.



62. Please note that we may process your personal data without your knowledge or consent, in compliance with this policy, where this is required or permitted by law.

### **Section Eleven: Who we share your data with and why**

63. We may share your data with organisations that work on our behalf or supply us with services to deliver the purposes set out in **section 4 above**.

64. This can include:

- ✿ a partner fundraising agency, such as Virgin Money Giving or Just Giving
- ✿ a partner or service provider who is assisting us in delivering a service or event (you will always be informed of this at the point of sign-up)
- ✿ a third-party mailing house or email distribution software provider
- ✿ a partner or service provider who is assisting us in messages and appeals through social media
- ✿ screening companies to check that our records remain up to date and accurate
- ✿ preference services such as TPS (Telephone Preference Service) and FPS (Fundraising Preference Service)
- ✿ our audit partner as part of our routine audit or control checks – our database provider

65. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

66. We may also need to disclose your personal information if required by law. This can include the police, regulatory bodies or legal advisors.

### **Section Twelve: International transfers**

67. Some of our third-party service providers (named in section 5 above) may store personal data outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

68. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- ✿ We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European



- ✿ Commission, and have a clear legislative direction. **COMPASS-Ghana** conforms to the Data Protection Act, 2012 (The Act) legislation enacted by the Parliament of the Republic of Ghana to protect the privacy and personal data of individuals.
- ✿ Where we use certain service providers, we will use specific contractual clauses approved by the European Commission which give personal data the same protection it has in Europe and/or the Data Protection Act 2012 (The Act) Parliament of the Republic of Ghana.
- ✿ Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield (or similar) framework which requires them to provide similar protection to personal data shared between Europe and the US.
- ✿ Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data outside of the EEA.

### **Section Thirteen: Keeping your personal data secure**

69. COMPASS-Ghana has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business requirement. They only process your personal data on our instructions and they are subject to a duty of confidentiality.
70. We have put in place procedures to deal with any suspected personal data breach. We will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Section Fourteen: Length of time we keep your personal data**

71. COMPASS-Ghana will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
72. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
73. In some circumstances, you can ask us to delete your data. For further information. (Details on registration)
74. In some circumstances **COMPASS-Ghana** may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.



75. **Donations:** We will keep information about your donation for six years after the end of the accounting period for which it relates (for example, if you donated on 1st June 2022, this would fall within the 2022/23 financial year (ending 31st March 2023) so your relevant information would be retained until 31st March 2029). This is necessary to comply with financial regulations, including HMRC Gift Aid rules.

## Section Fifteen: Your rights regarding your data

76. You have the right to:

- ✿ Request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- ✿ Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- ✿ Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

77. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which we will notify you of, if applicable, at the time of your request.

78. Object to processing of your personal data. Where we are relying on a legitimate interest (or those of a third party), you have the right to object to processing if you feel it impacts on your fundamental rights and freedoms.

79. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

80. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- ✿ if you want us to establish the data's accuracy
- ✿ where our use of the data is unlawful but you do not want us to erase it
- ✿ where you need us to hold the data even if we no longer require it, as you need it to establish, exercise or defend legal claims



☀ where you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

☀ Request the transfer of your personal data to you or to a third party.

81. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

82. You may withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or information to you. We will advise you if this is the case at the time you withdraw your consent.

83. If you wish to exercise any of the rights set out above, please email (Details on registration)

84. **Fees:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

85. **What we may need from you:** COMPASS-Ghana may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

86. **Time limit to respond:** We try to respond to all legitimate requests within one month of verification of your identity. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you at the earliest opportunity and keep you updated.

## Section Sixteen: Definitions:

87. Lawful basis for processing:

☀ **Legitimate Interest:** Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted



✿ to by law). *(Please contact us to obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities).*

✿ **Performance of Contract:** Performance of Contract, means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. This might include fulfilling an order you've placed through our website, or undertaking a training course with us.

✿ **Comply with a legal or regulatory obligation:** Comply with a legal or regulatory obligation, means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

✿ **Consent:** Consent means asking an individual for their permission to process their personal data, offering them real choice and control. It requires a positive action from the individual.

✿ **Key Roles:**

- i. **Data Controller:** Is an entity that determines the purposes, conditions and means of the processing of personal data. Controllers have a legal obligation to give effect to the rights of Data Subjects. This included the obligation to ensure the rights of the individual are upheld at all times.
- ii. **Data Processor:** Is a natural or legal person, authority or agency or any other body which processes personal data on behalf of the Controller. Data Processors are obliged to act only under the instructions of the Data Controller, comply with the Controllers' obligations and assist the Controller with regards to Data Subject Rights and handling any requests.
- iii. **Data Subject:** Is a living individual who is the subject of the personal data.

End  
July 2022