

## **Data Protection Statement related to procurements, partnerships and grants**

The International Federation of Red Cross and Red Crescent Societies (IFRC or Federation) is the world's largest humanitarian network. IFRC supports local Red Cross and Red Crescent action in more than 192 countries, bringing together almost 14 million volunteers for the good of humanity. It is therefore essential that our actions, and those of our partners, related to data protection are transparent.

This Statement seeks to provide procedures, protocols, and safeguards with respect to receipt, handling / processing of any personal data from grant applicants and other individual or business bidders related to the [procurement of goods and services](#). Additionally, this Statement outlines IFRC's expectation that these parties be able to adequately protect personal data that they process. It is expected that all bidders/applicants are able to provide evidence of their ability to protect personal data.

### **1. Why does the IFRC process personal data of grant applicants and other bidders?**

In order to carry out IFRC's humanitarian mandate, it is essential that to have sufficient information to allow for communication with the relevant individuals and to verify qualifications and other eligibility criterion, as part of our robust due diligence. IFRC may process your personal data to ensure the following:

1. that the prospective partner has the resources available (technical, financial, and professional) to fulfil its relevant obligations;
2. that its activities are not misaligned with IFRC's humanitarian mandate;
3. that there are no legal or other restrictions on its staff or operations that may interfere with the awarding or fulfilment of the contract;
4. that it meets any internal eligibility requirements; and
5. that there are no real or apparent conflicts of interest or other risks that could interfere with the fulfilment of the contract, harm the reputation of the Federation and/or cause harm to the populations IFRC serves.

With regard to successful applicants/bidders, IFRC will additionally process personal data in order to:

1. facilitate the coordination of work internally and with other partners (including governmental entities, where relevant);
2. monitor implementation of the contract/project;
3. provide any necessary training or technical assistance;
4. verify ongoing alignment with the Fundamental Principles and compliance with internal audit, archiving, finance, legal, and IFRC policy requirements;

5. maintain a register of partners, their activities, any respective violations of policy or other applicable requirements;
6. prevent, detect, and address any data breach;
7. research and provide learning to improve IFRC's processes; and
8. report (including by publication and/or bilaterally with governmental entities) on elements of the contract/project for transparency purposes or in order to satisfy other applicable requirements.

## **2. What personal data will be collected**

A. The following is typically required in order to fulfill the above purposes:

*Full name (and/or names of entity board members or other senior management); gender, salutation, business email and local address, phone number(s), title, nationality*

B. Depending on the type of contract/agreement, the relevant legal jurisdiction(s), and the nature of the goods or services to be provided, the following personal data may also be required:

*Birthdate, business or personal license number, relevant banking and/or business insurance information, a copy of a passport and/or national identity document, proof of health insurance*

Although IFRC typically processes personal data obtained directly from you, there may be cases where it obtains your personal data from third parties and/or resulting from research undertaken as part of its due diligence. Please note that additional (generally considered *non-personal*) information will likely also be necessary; this section only details relevant *personal data*.

IFRC Processors:

The information identified above will typically be submitted to the IFRC through its procurement portal (at IFRC.org) or through email. Accordingly, the information will be transmitted over the internet and processed by our trusted service providers, such as Microsoft. Third-party service providers will have their own privacy policies, which you are encouraged to review.

## **3. Legitimate bases for personal data processing**

The IFRC considers that the collection and processing of personal data as outlined above is necessary for one or more of the following legitimate bases: 1) it is in the IFRC's legitimate interest, 2) for the fulfillment of the contract, 3) for the establishment or defense of a legal claim (including with respect to IFRC's internal legal complaint and compliance mechanisms, including for audits and/or investigations), and 4) where IFRC is subject to a legal obligation.

## **4. How long will my personal data be kept?**

Information and documentation received before and after contracting may contain personal data. Relevant information and documentation may be entered into IFRC's supplier registry and will be retained for audit, project management, archiving and other business needs in accordance with IFRC's data retention policies, and otherwise only as long as necessary to fulfil the specified purpose(s).

## **5. Additional information on how your personal data is protected**

IFRC treats personal data according to its binding Policy on the Protection of Personal Data (which can be found [here](#)). Specific technical measures implemented to protect your personal data from unauthorized or accidental use, access, loss or alteration include password protected databases with access restrictions applied based on user roles. Access is monitored and logs are maintained. IFRC's IT infrastructure is mainly provided by/hosted by Microsoft Azure.

## **6. For any questions about your personal data?**

Should you have questions about IFRC's processing of your personal data or to make a request to correct or delete certain data, please contact [dataprotection@ifrc.org](mailto:dataprotection@ifrc.org). Please note that any request must comply with the steps outlined in the data protection policy and will be subject to identity verification. Certain requests may not be approved, as further outlined in Section 3 of the data protection policy.

## **7. Expectations of successful applicants/bidders**

In general, you are expected to treat any personal data that you process as a result of the applicable project/contract in compliance with applicable data protection and privacy laws. In the event that there are no applicable laws in the country (or countries) of performance of the contract/project, then IFRC's Policy on the Protection of Personal Data shall serve as the outline for your obligations. Those obligations include, but are not limited to:

1. Personal Data may only be used for the purposes of fulfilling this Agreement/contract/project/grant (as applicable), and more generally according to instructions of IFRC when it acts as the Data Controller;
2. A legal/legitimate basis (or bases) shall be identified for all processing operations;
3. Personal Data processing shall only be done so far as the data used and the means of processing consider the principles of proportionality, data accuracy and minimization;
4. You shall ensure (where you act as a Data Controller), that adequate and understandable information about Personal Data processing and any related rights shall be provided to data subjects;

5. You shall implement sufficient physical, organizational and technical safeguards to prevent the unauthorized alteration or loss of, or access to the Personal Data;
6. Where a third party (including any government) has requested personal data related to the Agreement/project/contract/grant, you shall promptly inform the IFRC to allow for the assertion of any privileges and immunities or other legal mechanisms that may protect all or part of the data from disclosure;
7. Except as strictly necessary for to fulfil the specified purpose(s) of the Agreement, you shall not undertake any onward transfer or sharing of the Personal Data to third parties without the IFRC's express agreement;
8. You shall not subcontract any part of the work involving the processing of Personal Data without ensuring appropriate protections are in place;
9. If you experience (or reasonably suspect) any security incident (Personal Data Breach) in relation to this Agreement, you shall promptly provide the IFRC with information on the nature of the incident, its likely consequences and the steps taken or proposed to be taken to address the incident;
10. You shall not maintain Personal Data any longer than necessary;
11. You agree to provide the IFRC, when necessary, reasonable, and in accordance with applicable data protection laws and/or internally binding policies, with information (including where necessary personal data) needed for the purposes of 1) demonstrating compliance with data protection obligations, 2) establishing or defending legal claims, 3), complying with contractual or legal obligations, 4) archiving, and 5) research and/or auditability. Such provision of information shall always be balanced against the rights of and the possible risks to data subjects.
12. **In the event that you (or your contracted partner or agent) process any Credit Cardholder data as part of the fulfilment of the Agreement/contract/project/grant, you shall be able to demonstrate continued compliance with Payment Card Industry (PCI) standards.**

## **8. Privileges and immunities**

Nothing in or related to this Statement shall be construed as a waiver, express or implied, of IFRC's privileges and immunities.