Data Protection and Privacy Policy

HOW RAWDAH HANDLES PERSONAL INFORMATION

Policy code	RYO/POL/05/2026
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1. Who we are and what this notice covers

Rawdah Youth Organization (RYO), Mogadishu, Somalia, runs educational, vocational training, youth-development and community programmes. This policy explains the intended handling of personal data collected through applications, attendance records, scholarships, training, surveys, website forms, partnerships and correspondence. It is drafted with reference to Somalia's Data Protection Act No. 005 (2023) and guidance issued by the Somalia Data Protection Authority.

2. Categories of information

Depending on the programme, RYO may process names, contact details, age, educational records, language assessments, work history, attendance, photographs (where authorised), identity-document information needed for lawful programme administration and limited sensitive information necessary for safeguarding or accessibility support. RYO shall avoid unnecessary sensitive data.

3. Purposes and lawful basis

Personal data shall be used for specified purposes such as delivering training, assessing eligibility, monitoring attendance, issuing certificates, communicating opportunities, fulfilling grant reporting, responding to complaints and meeting legal obligations. RYO must identify and document an appropriate lawful basis for each purpose; consent shall be sought where required and shall be meaningful, informed and freely given.

4. Sharing and international transfers

RYO may share limited necessary information with contracted instructors, service providers, programme funders, educational institutions and public authorities where lawful. Where information is transferred outside Somalia, including to Italy or other countries for educational opportunities, RYO shall assess applicable transfer requirements, transparency obligations, data minimisation and appropriate safeguards. Data will not be sold.

5. Security and retention

Authorised access shall be role-based; digital records protected by strong authentication and secure storage; and paper files kept securely. Retention periods must follow a documented schedule that reflects purpose, law and donor obligations, after which records are safely deleted or anonymised. Identifiable safeguarding cases require heightened restrictions.

6. Children, images and online activity

Children's information receives special protection, including age-appropriate communication and parental or guardian involvement where required. Photographs, testimonials and publication of

learners' names require suitable permissions. The website shall separately describe any actual cookies or analytics tools used; RYO must not claim to use or not use tools that have not been technically checked.

7. Data rights and concerns

Individuals may ask about their information and exercise applicable rights, including access, correction, objection, restriction or erasure, subject to lawful exceptions. Requests may be sent to info@rawdahyouth.org. RYO will verify identity proportionately and respond within the applicable legal deadlines. Individuals may also contact the Somalia Data Protection Authority.

8. Personal data incidents

Suspected loss, misuse or unauthorised disclosure must be reported immediately to the designated internal contact. RYO shall contain the incident, assess potential harm, preserve evidence, document decisions and notify the regulator or affected persons within applicable legal deadlines where required. Legal and technical verification is needed before this text is published as a final privacy notice.

Approval and implementation

This policy was approved by the Board of Directors of Rawdah Youth Organization on 02 November 2026 and is in force from that date.

Reference guidance

- Somalia Data Protection Authority - Guidance: https://dpa.gov.so/guidance-2/