**Processing and Protection of Personal Data of Persons of Concern**

*To be completed where, pursuant to Article 12.1 of Appendix 2 (Standard General Provisions) to the Partnership Agreement (PA), the processing of personal data of Persons of concern (PoCs) to UNHCR is part of the responsibilities of the partner and a requirement for the implementation of the project (see Project Statement, para. 1.1 in the Project Description, Annex A).*

1. **Nature and purpose of processing**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*Describe the specific and legitimate purposes of processing personal data. The purposes follow from the overall objective of the project but need to be more specific in order to allow a logical determination of the personal data elements necessary to be processed. Examples are: vulnerability assessments, delivery or provision of particular assistance or services or protection monitoring of PoCs. Should a new purpose arise in the course of the project, this needs to be expressly agreed in writing between the partner and UNHCR, and reflected in this Annex. Please include relevant correspondence in the Project File.*

*References: Para. 2.3 and 5.3 of UNHCR Data Protection Policy (DPP); para. 4.1 and 10.1.2 of the UNHCR Data Protection Guidance (DPG) and Article 12.2 of Appendix 2 to the PA.*

1. **Personal data elements necessary to be processed**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*List all personal data elements the partner would need to process for each of the above-mentioned specific purposes (e.g. names, addresses, phone numbers). Reference can also be made to existing templates or questionnaires. Should the partner need to process additional data elements in the course of the project, this can be agreed between UNHCR and the partner through a simple exchange of letters or e-mails. This Annex must be modified accordingly and the relevant correspondence included in the Project File.*

*References: Para. 2.4 DPP; para. 4.2 DPG and Article 12.2 of Appendix 2 to the PA.*

1. **Legitimate basis for the collection of personal data**

<*This section is mandatory where the partner is required to collect new personal data of PoCs. To be jointly developed by UNHCR with partner.>*

*State whether the partner needs to obtain consent from PoCs, and if so, how consent will be obtained (e.g. interview, counselling, phone), which information PoCs will be provided (e.g. specific purposes, data subjects’ rights) and how consent will be recorded (e.g. electronic or hand signature). State also the means and methods of data collection (e.g. mobile devices, paper).*

*References: Para. 2.2 and 5.3 DPP; para. 3.6 and 10.1.2 DPG and Article 12.2 of Appendix 2 to the PA.*

1. **UNHCR access to personal data collected by partner**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*State whether, how, what and how frequently personal data should be shared by the partner with UNHCR.*

1. **Access and user control measures**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*Describe how access to personal data of PoCs is managed, e.g. who is responsible for access control, and list the names of personnel who benefit from access within the partner.*

*References: Para. 5.2 and 5.4 DPP; para. 10.1.2 and 10.2 DPG and Article 12.4 of Appendix 2 to the PA.*

1. **Storage and transfer of personal data**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*Describe where personal data of PoCs will be stored, e.g. on UNHCR or Partner administered database, and how such data will be transferred, in particular to UNHCR. Describe applicable data storage and transfer, transport and communication control measures.*

*References: Para. 5.2 and 5.4 DPP; para. 10.1.2 and 10.2 DPG and Article 12.5 of Appendix 2 to the PA.*

1. **Data subjects’ rights**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*Describe whether and how the partner should deal with requests from data subjects for exercising their rights under the UNHCR Data Protection Policy, e.g. to whom in UNHCR such requests should be referred to. State also in which cases the partner may handle requests of data subjects on its own (e.g. access or correction) and whether and how UNHCR should be informed.*

*References: Para. 5.4 DPP; para. 10.2.1 DPG and Article 12.2 of Appendix 2 to the PA.*

1. **Personal data breach notification**

<*This section is mandatory. To be jointly developed by UNHCR with partner.>*

*Specify how and to whom a personal data breach should be notified in UNHCR including timelines.*

*References: Para. 4.4 DPP; para. 7.4 DPG and Article 12.6 of Appendix 2 to the PA.*

1. **Sharing/Transfers with subcontractors or third parties**

<*This section is not mandatory. Only to be filled out where onward sharing/transfer is foreseen to be necessary for the implementation of the project and authorized by UNHCR. To be jointly developed by UNHCR with partner.>*

*Specify the recipients of personal data (subcontractors and/or other third parties), the reasons for sharing / transfer, any existing contractual arrangements, and the third party’s obligations in relation to data security measures. If the need for sharing data with a third party arises during the term of the Agreement, UNHCR must approve such transfer in writing and this Annex must be modified accordingly* (*relevant correspondence to be included in the Project File).*

*References: Para. 5.2 DPP; Article 12.3 of Appendix 2 to the PA.*

1. **Termination arrangements**

<*This section is not mandatory. Only to be filled out if a deviation from the obligation to return and/or delete personal data at the end of the project is intended by the partner.>*

*State the reasons why the partner intends to retain personal data after termination of the project and the measures to be taken to that effect, including the way of collecting consent of data subjects and informing them accordingly.*

*References: Para. 5.5 DPP; para. 10.1.2 DPG and Article 12.8 of Appendix 2 to the PA.*