

Data Protection Policy

1. Purpose

World Aid Network (WAN) handles personal data, including the medical records of patients overseas. This policy ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and Information Commissioner's Office (ICO) guidance.

2. Data Protection Principles

WAN processes personal data lawfully, fairly and transparently; for specified, explicit and legitimate purposes; in a manner that is adequate, relevant and limited to what is necessary; accurately and kept up to date; for no longer than is necessary; and with appropriate security.

3. Lawful Bases

For clinical services, the primary lawful bases are explicit consent (Article 9(2)(a) UK GDPR) and the provision of health or social care (Article 9(2)(h)). For donor and supporter communications, the lawful bases are typically consent or legitimate interests, with appropriate balancing tests recorded.

4. Special Category and Safeguarding Data

Medical screenings (including for cataracts and oncology indications) and any safeguarding records are special category data. They are encrypted at the point of collection and stored on secure UK-compliant cloud infrastructure with role-based access restricted to authorised personnel. Safeguarding data is processed under the substantial public interest condition for safeguarding (Schedule 1, Part 2 DPA 2018).

5. International Data Transfers

Transfers from overseas medical camps to the UK board are protected by end-to-end encryption. Where personal data is transferred to or from countries outside the UK, an appropriate transfer mechanism (such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses) is in place, supported by a Transfer Risk Assessment. Data Protection Impact Assessments (DPIAs) are completed for all high-risk international processing.

6. Rights of Individuals

All data subjects have the right to be informed; to access their data; to rectification; to erasure (subject to medical record retention laws of typically six years); to restrict or object to processing; to data portability; and to lodge a complaint with the Information Commissioner's Office (ico.org.uk).

7. Personal Data Breaches

Suspected personal data breaches must be reported to the trustees without delay. The ICO will be notified within 72 hours of becoming aware where the breach is likely to result in a risk to individuals' rights and freedoms, and affected individuals will be informed where the

risk is high. Breaches with a safeguarding dimension are also reported under the Safeguarding Policy.

8. Records, Training and Review

WAN maintains a Record of Processing Activities. Trustees and personnel handling personal data complete data protection awareness training annually. This policy is reviewed annually by the trustees.