Data Protection is *People* Protection

MERCY CORPS

DATA PROTECTION & PRIVACY GUIDE:

Understanding Sensitive Data

Understanding the different classifications of data can be difficult, but they are an important part of working with humanitarian data. For example, what is the difference between personal data and sensitive data? Particular types of data may require special care in accordance with regional or national laws or organizational policies, and can present different types of risk to both program participants and organizations. Sensitive data is a sub-category of personal data and this section provides detailed guidance for processing and understanding it.

☆ Importance

A majority of Mercy Corps programs and other activities collect some kind of personal information about individuals. In many cases programs also collect information about an individual's cultural profile, sexual orientation, health, or biometrics and genetics. These types of information are considered sensitive data and if they are disclosed, accessed or shared improperly, could result in:

> harm to a person, such as sanctions, discrimination and security threats;

> a negative impact on Mercy Corps' ability to carry out activities and reduced trust or public perception.

It is vital to take the necessary steps to protect these data.

Guidance

This section contains two documents:

> "Guidance for processing of sensitive data" introduces you to sensitive data, key terms, and things to consider when planning its collection, storage, analysis, and sharing.

- Mercy Corps staff can access the Guidance in Mercy Corps' internal Digital Library.

- Anyone can download the template as a Microsoft Word document in English, Arabic, Spanish, French, and Russian.

> "Sensitive Information Assessment (SIA) Template" can be used with a Privacy Impact Assessment to document all additional safeguards being employed for sensitive data. This document also sets out the different legal bases that can be used to justify the collection and use of sensitive data.

- Mercy Corps staff can access the SIA template in Mercy Corps' internal Digital Library.

- Anyone can download the template as a Microsoft Word document in English, Arabic, Spanish, French, and Russian.

Further Assistance

Planning for the collection or use of sensitive data should be part of a larger strategy for the data life cycle of a program or activity. There are several resources that can help you.

> The International Federation of Red Cross and Red Crescent Societies (IFRC) *Data Playbook* is an excellent resource of exercises, session plans, checklists, and other materials to help you organize conversations and activities with your team. In particular, Module 4 - Responsible Data is a good place to start.

> The International Committee of the Red Cross' *Handbook on Data Protection in Humanitarian Action* is a detailed guide to almost every aspect of humanitarian data. Chapter 3 specifically deals with the legal basis for personal data processing.

> The Cash Learning Partnership's *Data Responsibility Toolkit* is designed for cash and voucher practitioners specifically, but is a gold standard in guidance for responsible data. Specifically, *Tip Sheet #2, "Design and Plan"* discusses lawful basis for sensitive data. The Toolkit is available in English, Arabic, French, and Spanish.

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About Mercy Corps
Mercy Corps is a leading global organization
powered by the belief that a better world is possible.
In disaster, in hardship, in more than 40 countries
around the world, we partner to put bold solutions
into action—helping people triumph over adversity
and build stronger communities from within.
Now, and for the future.

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