



MOSES WELFARE FOUNDATION

"Bring Back The Smiles"

Data Protection & Privacy Policy

Policy Number: MWF-DPP-001

Version: 1.0

Effective Date: 28 July 2026

Review Date: 28 July 2027

Approved By: Board of Directors, Moses Welfare Foundation

Data Protection & Privacy Policy

1. Policy Statement

Moses Welfare Foundation (MWF) is committed to protecting the privacy, confidentiality, and security of all personal information entrusted to the Foundation. We recognize that beneficiaries, donors, employees, volunteers, partners, and supporters have the right to expect that their personal data will be collected, processed, stored, used, shared, and disposed of responsibly, lawfully, and transparently.

As a Christian humanitarian and development organization, MWF is committed to safeguarding personal information with integrity, respect, and accountability while maintaining the trust of the communities we serve.

MWF will implement appropriate organizational and technical measures to protect personal data against unauthorized access, disclosure, alteration, loss, misuse, or destruction.

2. Purpose

The purpose of this policy is to:

- Protect the privacy rights of individuals whose data is processed by MWF.
- Ensure responsible and lawful handling of personal information.
- Promote confidentiality and information security.
- Reduce the risk of data breaches.
- Define responsibilities for data protection.
- Support compliance with applicable privacy laws, donor requirements, and recognized international good practice.

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*Head Office: Office No: ff49, 1st floor New Liberty Tower, Model Link Road, Lahore
Sub Branch: Bahar Colony No. Kot Lakhapt LHR*





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3. Scope

This policy applies to:

- Board Members
- Employees
- Volunteers
- Consultants
- Interns
- Contractors
- Partner Organizations processing MWF data
- Temporary Staff
- Service Providers handling MWF information

The policy applies to all personal information collected through:

- Programme activities
- Donor management
- Human resources
- Recruitment
- Financial management
- Child sponsorship programmes
- Volunteer management
- Medical programmes
- Surveys and assessments
- Websites
- Email communication
- Mobile applications
- Social media
- Cloud-based systems
- Paper records

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4. Definitions

Personal Data

Any information relating to an identified or identifiable individual.

Examples include:

- Name
- National identity number
- Passport number
- Address
- Telephone number
- Email address
- Date of birth
- Photograph
- Financial information
- Employment information
- Family information
- Location information
- Online identifiers

Sensitive Personal Data

Information requiring additional protection, including:

- Health information
- Disability information
- Biometric data
- Child protection records
- Financial account information
- Religious or ethnic information where collected lawfully and for legitimate organizational purposes
- Safeguarding case records

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Data Subject

The individual whose personal information is collected or processed.

5. Principles of Data Protection

MWF shall process personal data according to the following principles:

Lawfulness

Personal information shall be processed in accordance with applicable legal obligations and legitimate organizational purposes.

Fairness

Individuals shall be treated fairly and informed about how their information is used.

Transparency

MWF shall communicate clearly about the collection and use of personal data.

Purpose Limitation

Information shall only be collected for specified, explicit, and legitimate purposes.

Data Minimization

Only information that is necessary for organizational activities shall be collected.

Accuracy

Personal data shall be kept accurate and updated where reasonably practicable.

Storage Limitation

Information shall not be retained longer than necessary unless required by law, donor obligations, or organizational needs.

Integrity and Confidentiality

Appropriate safeguards shall protect personal information against unauthorized access, disclosure, alteration, or loss.

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Accountability

MWF accepts responsibility for complying with this policy and continuously improving its data protection practices.

6. Collection of Personal Information

MWF may collect personal information for purposes including:

- Programme registration
- Beneficiary assistance
- Child protection
- Donor communication
- Grant management
- Volunteer management
- Employment
- Financial transactions
- Event registration
- Monitoring and evaluation
- Legal compliance

Where appropriate, individuals will be informed of the purpose for collecting their information.

7. Lawful Use of Personal Data

Personal information shall only be used for legitimate organizational purposes, including:

- Delivering humanitarian programmes.
- Assisting beneficiaries.
- Managing donations.
- Communicating with supporters.
- Recruiting employees and volunteers.
- Financial administration.
- Monitoring, evaluation, and reporting.
- Legal and regulatory compliance.
- Safeguarding and risk management.

MWF will not sell, rent, or trade personal information to third parties.

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8. Consent

Where consent is the appropriate legal basis for processing, MWF will seek clear and informed consent before collecting or using personal information.

Individuals may withdraw consent at any time where legally and operationally appropriate. Withdrawal of consent may affect MWF's ability to provide certain services where the information is necessary for programme delivery or legal compliance.

9. Protection of Children's Information

Children's personal information shall receive enhanced protection.

MWF will:

- Collect only information necessary for programme purposes.
- Obtain consent from a parent or legal guardian where required by law or organizational procedures.
- Protect children's identities in publications where disclosure could place them at risk.
- Restrict access to child protection records.
- Follow the MWF Child Protection and Safeguarding Policies.

10. Confidentiality

All personnel shall protect confidential information obtained through their work.

Confidential information shall not be disclosed except:

- With appropriate authorization.
- Where required by law.
- To protect the safety of individuals.
- For legitimate organizational purposes on a need-to-know basis.

All employees, volunteers, consultants, and contractors shall maintain confidentiality during and after their engagement with MWF.

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11. Information Security

MWF shall implement reasonable administrative, physical, and technical safeguards, including:

- Password-protected systems.
- Role-based access controls.
- Secure storage of paper files.
- Locked filing cabinets for confidential records.
- Encryption where appropriate.
- Secure cloud storage.
- Regular software updates.
- Anti-malware protection.
- Secure backup procedures.
- Secure disposal of confidential documents.

12. Data Sharing

Personal information shall only be shared:

- With authorized personnel.
- With partner organizations where necessary for programme delivery and subject to appropriate safeguards.
- With donors where required by grant agreements and without unnecessary disclosure of personally identifiable information.
- With auditors under confidentiality obligations.
- With regulatory or law enforcement authorities where legally required.
- With service providers operating under appropriate contractual confidentiality and data protection obligations.

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13. Data Retention and Disposal

MWF shall retain personal information only for as long as necessary to:

- Deliver programmes.
- Meet donor obligations.
- Comply with legal requirements.
- Resolve disputes.
- Support audits.

When no longer required, records shall be securely destroyed or permanently deleted using appropriate disposal methods.

14. Data Breach Management

A personal data breach includes accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal information.

Any suspected breach shall be reported immediately.

MWF shall:

- Contain the incident.
- Assess potential risks.
- Protect affected individuals where possible.
- Investigate the cause.
- Implement corrective actions.
- Notify relevant authorities or affected individuals where required by applicable law or contractual obligations.

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15. Individual Rights

Subject to applicable law, individuals may request to:

- Know whether MWF holds their personal information.
- Request correction of inaccurate information.
- Request deletion where legally permissible.
- Withdraw consent where applicable.
- Object to certain processing activities where permitted by law.
- Submit complaints regarding the handling of their personal information.

Requests shall be handled fairly, consistently, and within a reasonable timeframe.

16. Responsibilities

Board of Directors

The Board shall:

- Approve this policy.
- Promote a culture of privacy and confidentiality.
- Oversee organizational compliance.

Chairman / Executive Director

The Chairman shall:

- Ensure implementation of this policy.
- Allocate appropriate resources.
- Promote awareness and accountability.

Data Protection Focal Person

The designated Data Protection Focal Person shall:

- Monitor compliance.
- Advise staff on data protection requirements.
- Coordinate responses to data breaches.
- Maintain records of reported incidents.
- Support privacy training.

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Employees and Volunteers

Every representative of MWF shall:

- Protect confidential information.
- Follow this policy.
- Report suspected data breaches immediately.
- Complete required training.
- Use organizational information only for authorized purposes.

17. Training and Awareness

MWF shall provide periodic training on:

- Privacy principles.
- Confidentiality.
- Secure information handling.
- Password security.
- Phishing awareness.
- Data breach reporting.
- Protection of children's information.
- Safe use of digital systems.

New personnel shall receive data protection awareness during induction.

18. Monitoring and Compliance

Compliance shall be monitored through:

- Internal reviews.
- Information security assessments.
- Data protection audits.
- Management oversight.
- Risk assessments.
- Policy reviews.
- Corrective action plans.

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19. Policy Violations

Failure to comply with this policy may result in:

- Corrective action.
- Mandatory retraining.
- Disciplinary measures.
- Suspension.
- Termination of employment or volunteer engagement.
- Termination of contracts or partnerships.
- Referral to the appropriate authorities where required by law.

20. Policy Review

This policy shall be reviewed annually or sooner if required by changes in legislation, technology, donor requirements, or organizational operations.

21. Commitment

Moses Welfare Foundation is committed to protecting the personal information entrusted to us by beneficiaries, donors, employees, volunteers, and partners. By implementing strong privacy practices, secure information management, and a culture of accountability, we strengthen trust, protect individual rights, and support the effective delivery of our humanitarian mission.

Approval

This Data Protection & Privacy Policy has been approved by the Board of Directors of Moses Welfare Foundation and is binding on all Board Members, employees, volunteers, consultants, contractors, partner organizations, and service providers acting on behalf of the Foundation.

Approved By: Board of Directors, Moses Welfare Foundation

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"Protecting Information. Preserving Trust. Serving with Integrity."



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