

PRIVACY POLICY

INTERNATIONAL HUMAN RIGHTS ORGANIZATION WORLD SOCIETY

IHRO WORLD SOCIETY

Effective Date: 26 September 2026

Version: 1.0

Organization Type: International Non-Profit / Non-Governmental Organization

Website: www.ihro-world.org

1. INTRODUCTION

International Human Rights Organization World Society (“**IHRO World Society**,” “**IHRO**,” “**we**,” “**us**,” or “**our**”) is an international non-profit organization committed to promoting and protecting human rights, dignity, equality, peace, justice, sustainable development, humanitarian values, environmental responsibility, and international cooperation.

IHRO World Society recognizes privacy and the responsible protection of personal information as important components of human dignity and fundamental rights.

This Privacy Policy explains how IHRO World Society may **collect, receive, use, process, store, protect, disclose, transfer, and retain personal information** obtained through its website, membership activities, humanitarian and development programs, events, campaigns, donor activities, volunteer programs, partnership activities, communications, applications, surveys, and other organizational functions.

This Policy is intended to reflect:

- the **Universal Declaration of Human Rights (UDHR)**;
- relevant United Nations principles and standards;
- the **UN Personal Data Protection and Privacy Principles**;
- the objectives and partnership principles of **Sustainable Development Goal 17 (SDG 17)**;
- applicable international human-rights and privacy principles;
- the Constitution and applicable laws of Bangladesh; and
- applicable data-protection, cybersecurity and privacy requirements in jurisdictions where IHRO operates.

UDHR Article 12 recognizes protection against arbitrary interference with privacy, family, home or correspondence and protection against attacks upon honour and reputation.

2. PURPOSE OF THIS POLICY

The purposes of this Privacy Policy are to:

1. protect the privacy and personal information of individuals;
2. establish responsible data-management practices within IHRO;
3. ensure transparency concerning the collection and use of personal information;
4. prevent unauthorized access, disclosure, misuse, alteration or loss of information;
5. respect the rights and dignity of members, beneficiaries, volunteers, donors, employees, partners and other stakeholders;
6. establish accountability for personal-data processing;
7. support responsible international cooperation and partnerships;
8. comply with applicable laws and regulatory requirements; and
9. strengthen public trust in IHRO World Society.

3. HUMAN RIGHTS AND PRIVACY COMMITMENT

IHRO World Society considers privacy protection an integral part of its human-rights mission.

IHRO shall seek to process personal information in a manner consistent with the principles of:

- dignity;
- equality;
- non-discrimination;
- legality;
- fairness;
- transparency;
- accountability;
- confidentiality;
- necessity;
- proportionality;
- security; and
- respect for individual rights.

IHRO shall not intentionally process personal information in a manner that unlawfully discriminates against individuals or groups.

4. SCOPE OF THIS POLICY

This Policy applies to personal information collected or processed by IHRO World Society through or in connection with:

- the IHRO website;
- membership applications;
- volunteer applications;
- donor and fundraising activities;
- humanitarian programs;
- human-rights programs;
- environmental and SDG programs;
- training and educational programs;
- conferences, seminars and webinars;
- surveys and research;
- complaints and feedback mechanisms;
- project applications;
- partnership applications;
- accreditation activities;
- certificates and awards;
- employment and recruitment;
- official correspondence;
- social-media activities;
- digital communications;
- photographs, videos and event documentation; and
- other legitimate organizational activities.

5. TYPES OF INFORMATION WE MAY COLLECT

Depending on the nature of the relationship with IHRO, we may collect:

5.1 Identification Information

- name;
- nationality;
- date of birth where necessary;
- photograph;
- identification or membership information;
- professional title;
- organization and position.

5.2 Contact Information

- email address;
- telephone/mobile number;
- postal address;
- country and city;
- organizational contact information.

5.3 Membership and Volunteer Information

- membership application information;
- professional qualifications;
- education and training;
- experience;
- areas of interest;
- volunteer activities;
- organizational affiliations where relevant to the program.

5.4 Donor and Financial Information

Where necessary for lawful fundraising or financial administration, IHRO may process:

- donor name;
- donation amount;
- transaction reference;
- payment information provided through authorized payment providers;
- receipts and related financial records.

IHRO should not unnecessarily retain complete payment-card information where the transaction is processed through an authorized third-party payment service.

5.5 Program and Beneficiary Information

For humanitarian, human-rights and development programs, IHRO may collect information reasonably necessary to:

- assess eligibility;
- deliver assistance;
- monitor projects;
- conduct research;
- measure impact;
- prepare donor reports; and
- Comply with legal or funding requirements.

Where particularly sensitive information is involved, IHRO shall apply enhanced safeguards and collect only information that is reasonably necessary.

5.6 Digital Information

When individuals interact with our website or digital services, technical information may include:

- IP address;
- browser type;
- device information;
- operating system;
- access date and time;
- referring website;
- pages visited;
- cookies and similar technologies; and
- website security logs.

6. SOURCES OF PERSONAL INFORMATION

IHRO may obtain information:

1. directly from individuals;
2. from membership or volunteer applications;
3. from donors;
4. from partner organizations;
5. from project beneficiaries;
6. from authorized representatives;
7. from public sources where legally permissible;
8. through events and programs;
9. through the IHRO website;
10. through surveys or forms; and
11. through service providers acting on behalf of IHRO.

IHRO shall seek to ensure that personal information is obtained through lawful and fair means.

7. PURPOSES FOR PROCESSING PERSONAL INFORMATION

IHRO may process personal information for legitimate organizational purposes, including:

- administering membership;
- managing volunteers;
- delivering humanitarian assistance;
- implementing human-rights programs;
- implementing SDG-related activities;
- organizing events;
- communicating with stakeholders;
- managing donations;
- issuing certificates;
- conducting research;
- monitoring and evaluating projects;
- preparing reports;
- maintaining organizational records;
- complying with legal obligations;
- preventing fraud and misuse;
- protecting organizational systems;
- responding to inquiries and complaints;
- maintaining donor and partner relationships; and
- supporting international cooperation and partnerships.

IHRO shall seek to avoid using personal information for purposes incompatible with the purpose for which it was collected.

This reflects internationally recognized principles of **purpose specification, use limitation, necessity, proportionality and accountability**.

8. LAWFUL BASIS FOR PROCESSING

Where applicable, IHRO may process personal information on the basis of:

- consent;
- performance of a requested service or organizational relationship;
- legitimate organizational purposes;
- compliance with legal obligations;
- protection of vital interests;
- public-interest or humanitarian purposes where legally permitted;
- contractual or partnership requirements; or
- other lawful bases recognized by applicable law.

Under Bangladesh's **Personal Data Protection Act, 2026**, personal-data processing is regulated and the law recognizes the individual's interest in personal data and establishes obligations concerning data processing and protection.

9. CONSENT

Where consent is required, IHRO shall seek consent in a manner that is:

- informed;
- specific;
- understandable;
- voluntary; and
- capable of being withdrawn where applicable.

Withdrawal of consent shall not affect processing that was lawfully undertaken before withdrawal, or processing that may otherwise be permitted or required by law.

10. DATA MINIMIZATION

IHRO shall seek to collect only personal information that is:

- relevant;
- adequate;
- reasonably necessary; and
- proportionate to the stated purpose.

IHRO shall not intentionally collect excessive personal information merely because it may be useful in the future.

The UN privacy principles emphasize proportionality and necessity, while OECD principles similarly support collection limitation and purpose specification.

11. ACCURACY OF PERSONAL INFORMATION

IHRO shall take reasonable measures to maintain accurate and, where necessary, up-to-date personal information.

Individuals may contact IHRO to request correction of inaccurate or incomplete information, subject to applicable legal requirements and legitimate record-keeping obligations.

12. CONFIDENTIALITY

IHRO shall maintain appropriate confidentiality over personal information.

Personal information shall be accessed only by persons who have a legitimate organizational need to access it, subject to applicable law and IHRO's internal authorization procedures.

Employees, volunteers, officers, consultants and authorized representatives who have access to confidential information should be required to respect confidentiality obligations.

The UN Personal Data Protection and Privacy Principles specifically identify confidentiality and security as core principles.

13. INFORMATION SECURITY

IHRO shall implement reasonable organizational, administrative, physical and technical safeguards designed to protect personal information against:

- unauthorized access;
- unauthorized disclosure;
- accidental loss;
- destruction;
- alteration;
- misuse;
- theft;
- cyber attack; and
- other unlawful or unauthorized processing.

Security measures may include:

- access controls;
- passwords and authentication;
- restricted administrative access;
- secure storage;
- backup procedures;
- encryption where appropriate;
- confidentiality obligations;
- cyber security controls;
- staff awareness and training; and
- incident-response procedures.

Bangladesh's Personal Data Protection Act, 2026 requires appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, loss, destruction, damage and misuse.

14. CHILDREN AND VULNERABLE PERSONS

IHRO recognizes that children and vulnerable persons may require enhanced privacy protection.

Where IHRO collects personal information relating to children or vulnerable individuals in connection with humanitarian, educational or human-rights activities, it shall apply appropriate safeguards and comply with applicable law.

Photographs, names, stories or other identifying information concerning children or vulnerable beneficiaries should not be publicly disclosed without an appropriate lawful basis and safeguards.

15. HUMANITARIAN AND HUMAN-RIGHTS INFORMATION

Because IHRO may work with human-rights defenders, victims, beneficiaries, vulnerable communities and persons involved in sensitive cases, certain information may carry elevated risks.

IHRO shall therefore seek to:

- limit collection of sensitive information;
- restrict access on a need-to-know basis;
- avoid unnecessary publication of identifying information;
- use anonymization or pseudonymization where appropriate;
- protect confidential complaints and case information;
- assess risks before public disclosure; and
- prioritize the safety and dignity of affected persons.

16. PHOTOGRAPHS, VIDEO AND MEDIA

IHRO may photograph, record or document its events and activities for legitimate organizational purposes, including:

- annual reports;
- program documentation;
- awareness campaigns;
- educational materials;
- websites;
- social media;
- newsletters;
- donor reporting; and
- public communications.

Where reasonably appropriate, IHRO shall provide notice and obtain consent or rely on another lawful basis before publishing identifiable images, particularly where children, vulnerable persons or sensitive humanitarian circumstances are involved.

Individuals may contact IHRO regarding concerns about the publication of their image.

17. COOKIES AND WEBSITE TECHNOLOGIES

IHRO's website may use cookies or similar technologies to:

- operate the website;
- maintain security;
- remember preferences;
- understand website usage;
- improve website performance; and
- support legitimate analytics.

Where legally required, IHRO shall provide appropriate notice and obtain consent for non-essential cookies.

18. THIRD-PARTY SERVICE PROVIDERS

IHRO may engage trusted third parties to support organizational activities, including:

- website hosting;

- cloud storage;
- email services;
- payment processing;
- event management;
- information technology;
- cybersecurity;
- communications;
- analytics; and
- project-management services.

Such third parties should process personal information only for authorized purposes and, where applicable, under appropriate contractual or legal safeguards.

19. DISCLOSURE OF PERSONAL INFORMATION

IHRO shall not sell personal information.

IHRO may disclose personal information where reasonably necessary and lawful to:

- authorized employees or officers;
- project partners;
- service providers;
- auditors;
- professional advisers;
- donors or funding agencies where reporting requires it;
- government or regulatory authorities where legally required;
- courts or law-enforcement authorities pursuant to lawful processes; or
- other persons where the individual has provided appropriate consent.

IHRO shall seek to limit disclosure to the information reasonably necessary for the relevant purpose.

20. INTERNATIONAL DATA TRANSFERS

As an international organization, IHRO may operate across national borders and may need to transfer information between countries.

Where personal information is transferred internationally, IHRO shall seek to apply appropriate safeguards consistent with:

- applicable Bangladesh law;
- applicable law in the receiving jurisdiction;
- contractual safeguards;
- confidentiality requirements;
- security requirements; and
- internationally recognized privacy principles.

The UN principles recognize that international transfers may occur where appropriate protection is provided, while maintaining accountability for personal data.

21. DATA RETENTION

IHRO shall retain personal information only for as long as reasonably necessary for:

- the purpose for which it was collected;
- membership administration;
- project implementation;
- financial accountability;
- donor reporting;
- legal compliance;
- safeguarding;
- audit requirements;
- organizational records; or
- legitimate historical and archival purposes.

When personal information is no longer required, IHRO should securely delete, destroy, anonymize or otherwise appropriately dispose of it, subject to applicable legal and archival requirements.

22. DATA SUBJECT RIGHTS

Subject to applicable law and legitimate exceptions, individuals may have rights concerning their personal information, including the right to:

- know whether IHRO processes their personal information;
- request access to their information;
- request correction of inaccurate information;

- request updating of information;
- request deletion where legally applicable;
- object to certain processing;
- withdraw consent where consent is the legal basis;
- request information concerning processing purposes;
- raise concerns about unauthorized disclosure; and
- lodge a complaint concerning privacy practices.

The precise scope and availability of these rights may depend on applicable law and the circumstances of the processing.

Bangladesh's Personal Data Protection Act, 2026 establishes a statutory framework for personal-data protection and processing.

23. PRIVACY REQUESTS

Individuals may submit privacy-related requests to IHRO by contacting:

Privacy & Data Protection Office

International Human Rights Organization World Society (IHRO World Society)

Website: www.ihro-world.org

Email: info@ihro-world.org

A request should contain sufficient information to enable IHRO to identify the requester and understand the nature of the request.

IHRO may take reasonable steps to verify the identity of the requester before providing or modifying personal information.

24. DATA BREACH AND SECURITY INCIDENTS

IHRO shall maintain procedures for responding to suspected or confirmed personal-data breaches.

Where a security incident occurs, IHRO may:

1. identify and contain the incident;
2. assess potential risks;

3. preserve relevant evidence;
4. take corrective measures;
5. notify relevant authorities where legally required;
6. notify affected individuals where appropriate or legally required; and
7. document the incident and corrective actions.

25. CYBERSECURITY AND DIGITAL SAFETY

IHRO recognizes cybersecurity as an important element of privacy protection.

IHRO shall take reasonable steps to protect organizational information systems from unauthorized access, cyberattacks, fraud, malicious activities and unlawful processing.

Bangladesh's **Cyber Security Act, 2026** is the current statutory framework replacing the 2025 Cyber Security Ordinance and includes provisions concerning cybersecurity and cyber offences.

26. COMPLAINTS AND GRIEVANCE MECHANISM

Any person who believes that IHRO has improperly processed their personal information may submit a privacy complaint.

Complaints should include:

- name and contact information;
- description of the concern;
- relevant dates;
- supporting documents where available; and
- the remedy or action requested.

IHRO shall seek to review complaints fairly and confidentially.

Nothing in this Policy prevents an individual from exercising rights available under applicable law or approaching a competent regulatory or judicial authority.

27. NON-DISCRIMINATION

IHRO shall not unlawfully discriminate against individuals because they have:

- exercised a privacy right;
- requested access to their information;
- requested correction;
- submitted a privacy complaint; or
- withdrawn consent where withdrawal is legally permitted.

28. ACCOUNTABILITY

IHRO World Society is committed to institutional accountability for its privacy practices.

The organization shall seek to establish:

- designated responsibility for data protection;
- internal privacy procedures;
- staff confidentiality requirements;
- appropriate access controls;
- data-retention procedures;
- incident-response mechanisms;
- privacy awareness and training;
- vendor and partner safeguards; and
- periodic review of this Policy.

The UN framework similarly emphasizes accountability and appropriate organizational mechanisms for personal-data protection.

29. PRIVACY BY DESIGN

Where reasonably practicable, IHRO shall consider privacy and data-protection risks when developing:

- new programs;
- websites;
- databases;
- membership systems;
- humanitarian projects;

- digital platforms;
- surveys;
- research activities; and
- information-management systems.

Privacy safeguards should be incorporated into processes at the planning stage rather than added only after a problem occurs.

30. SDG 17 AND RESPONSIBLE PARTNERSHIPS

IHRO World Society recognizes **Sustainable Development Goal 17 – Partnerships for the Goals** as an important framework for international cooperation.

SDG 17 emphasizes partnerships, resource mobilization, institutional capacity and cooperation among governments, civil society, development partners and other stakeholders.

Accordingly, IHRO shall seek to ensure that information shared with partners is:

- relevant;
- proportionate;
- lawfully obtained;
- appropriately protected;
- shared for legitimate purposes; and
- subject to appropriate confidentiality and security safeguards.

31. INTERNATIONAL STANDARDS AND PRINCIPLES

This Policy is intended to be informed by, as applicable:

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- UN Personal Data Protection and Privacy Principles;
- UN human-rights principles;
- UN 2030 Agenda for Sustainable Development;
- Sustainable Development Goal 17;
- OECD Privacy Guidelines;

- applicable international humanitarian principles;
- applicable international NGO good-governance principles; and
- relevant national laws and regulations.

The OECD framework identifies principles including collection limitation, data quality, purpose specification, use limitation, security safeguards, openness, individual participation and accountability.

32. BANGLADESH LEGAL FRAMEWORK

For operations and processing activities subject to Bangladesh law, IHRO shall seek to comply with applicable requirements, including, as relevant:

32.1 Constitution of the People's Republic of Bangladesh

Article 43 provides protection concerning the privacy of correspondence and other means of communication, subject to lawful restrictions.

32.2 Personal Data Protection Act, 2026

The **Personal Data Protection Act, 2026 (Act No. 63 of 2026)** establishes a statutory framework concerning personal-data protection, processing and related responsibilities.

The Act also addresses technical and organizational measures for maintaining security, integrity and confidentiality of personal data.

32.3 Cyber Security Act, 2026

IHRO shall seek to comply with applicable cybersecurity requirements under the **Cyber Security Act, 2026**, including requirements relevant to organizational digital systems and cybersecurity.

32.4 Other Applicable Laws

Depending upon the specific activity, IHRO shall also comply with other applicable laws, regulations, rules, contractual requirements and regulatory directions in Bangladesh.

33. POLICY HIERARCHY

Where this Privacy Policy conflicts with mandatory applicable law, the applicable law shall prevail to the extent of the conflict.

Where another jurisdiction imposes stronger mandatory privacy protections applicable to a particular processing activity, IHRO shall seek to comply with those requirements where legally applicable.

34. POLICY REVIEW

IHRO World Society shall periodically review this Privacy Policy to ensure that it remains appropriate in light of:

- changes in applicable law;
- technological developments;
- organizational activities;
- international standards;
- cybersecurity risks;
- new data-processing activities; and
- lessons learned from privacy incidents or complaints.

35. AMENDMENTS

IHRO reserves the right to amend this Privacy Policy when necessary.

The updated version shall indicate the revised effective date.

Where appropriate, material changes may be communicated through the IHRO website or other appropriate communication channels.

36. CONTACT INFORMATION

For questions, complaints, requests or concerns relating to privacy and personal-data protection:

International Human Rights Organization World Society (IHRO World Society)
Privacy & Data Protection Office

Website: www.ihro-world.org

Email: info@ihro-world.org

Country Office: Bangladesh

International Operations: As applicable

37. DECLARATION

IHRO World Society is committed to respecting human dignity, privacy, confidentiality, equality and fundamental rights in all of its activities.

We recognize that responsible management of personal information is not merely an administrative responsibility but an important component of **human rights, ethical governance, accountability and public trust.**

IHRO World Society shall therefore seek to ensure that personal information entrusted to the organization is handled lawfully, fairly, transparently, securely and responsibly, consistent with its humanitarian mission, the **Universal Declaration of Human Rights**, the **2030 Sustainable Development Agenda, SDG 17**, applicable international principles and applicable national laws.

Approved by:

International Human Rights Organization World Society (IHRO World Society)

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Review Cycle: At least annually or whenever significant legal/organizational changes occur.