Refugee Emergency Fund (REF)
Data Protection & Privacy Policy

Policy Number	POL002-REF	**Effective Date**	January 15, 2026
Policy Focal Point	Lovish Sekaran Program Strategy & Impact Coordinator	**Focal Point Email**	lovish@refmalaysia.org +61 452 639 023
Last Review Date	January 6, 2026	**Approved By**	Hasan Al-Akraa Founder & Director

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1. Purpose and Commitment

Refugee Emergency Fund (REF) is committed to protecting the privacy, dignity, and personal information of all individuals who engage with our organization. This includes people who receive our services, as well as staff, volunteers, donors, partners, and others who work with or support REF. This policy is available on REF's official website.

We recognize that many of the individuals we serve are in vulnerable situations. We therefore take special care to ensure that personal information is handled respectfully, safely, and confidentially. REF's data protection practices are guided by humanitarian principles, including **do no harm, informed consent, data minimization, confidentiality, and accountability**, and are aligned with applicable data protection laws in Malaysia, including the **Personal Data Protection Act 2010 (PDPA)**.

This policy explains:

- What personal information REF collects
- How and why this information is collected and used
- How REF protects personal data
- The rights individuals have over their personal data

2. Policy Scope

This policy applies to all personal data processed by Refugee Emergency Fund (REF), including data related to:

- Clients (people served by REF)
- Staff, consultants, and contractors
- Committee and board members
- Volunteers and interns
- Referral partners and external caseworkers
- Donors and funders

It applies to all forms of data processing, whether information is collected, stored, accessed, shared, transmitted, or deleted in **digital, physical, or verbal form**. All individuals acting on behalf of REF must comply with this policy, regardless of role, location, or length of engagement.

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3. Principles Governing Data Protection

REF processes personal data according to the following principles:

- **Lawful and Fair Use:** Personal data is collected and used only for legitimate humanitarian, operational, administrative, or legal purposes related to REF's work.
- **Informed Consent:** Personal data is collected with the knowledge and permission of the individual, after they are informed of why the data is needed, how it will be used, and their rights. Exceptions may apply only to protect life or safety.
- **Data Minimization:** REF collects only the minimum information necessary to provide services or carry out its work.
- **Purpose Limitation:** Data is used only for the purpose for which it was collected.
- **Accuracy:** Reasonable steps are taken to ensure personal data is accurate and kept up to date.
- **Security and Confidentiality:** Appropriate safeguards are used to protect data from loss, misuse, or unauthorized access.
- **Accountability:** All REF staff, volunteers, partners, and representatives are responsible for protecting personal data and following this policy.

4. Information We Collect

From Clients

- **Personal Information**: Full name, date of birth, sex, country of origin, current address in Malaysia, contact details, and legal or documentation status (where relevant).
- **Household and Socioeconomic Information:** Marital status, household size, employment status, income, and financial situation.
- **Identity Documents:** UNHCR cards, passports, or other identification documents. REF will not deny services solely due to a lack of documentation.
- **Health and Medical Information:** Collected only when medical assistance is requested. This includes medical conditions, treatment needs, reports, estimates, and bills. Medical data is treated as highly sensitive.
- **Housing and Financial Information:** For rental or housing assistance, REF may collect rental amounts, lease agreements, eviction notices, landlord communications, and, in some cases, landlord bank details.
- **Vulnerability and Protection-Related Information:** Information related to disability, age-related risks, protection concerns, or safety risks, collected sensitively and only when necessary.

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From Referral Partners and Caseworkers

Full name, organization or affiliation, role, email address, and phone number. Bank account details may be collected only when needed to make payments on behalf of REF.

From Staff, Volunteers, and Contractors

Full name, date of birth, sex, country of origin, home address, phone number, email address, identification number, ID photo, and photo for internal workspace use. Bank account details are collected for payroll, reimbursements, or payments.

From Donors and Funders

REF collects limited donor information depending on how a donation is made.

- **Direct Bank Transfers:** REF does not actively collect donor details, but donor names or references may appear in bank statements. This information is kept confidential and used only for accounting, audit, and accountability purposes.
- **Third-Party Platforms:** When donations are made through platforms such as GiveAsia or ToyyibPay, REF may receive limited information such as name, email address, donation amount, and sometimes phone number, subject to the platform's own privacy policies.

REF does not sell or trade donor information and uses it only for donation management, reporting, and legal compliance.

5. How We Collect Information

Direct Collection

Information is usually collected directly from individuals through:

- Intake interviews or conversations
- Phone calls or messages
- Referral forms from partners, caseworkers, and external parties
- Written or digital forms
- Subscription to our mailing list, sign up at events or community stalls (such as bazaars), or otherwise voluntarily provide their contact details (including email addresses and phone numbers) with consent.
- For internal cases, interviews are conducted in private and confidential settings. Interpretation support is provided when needed.

Third-Party Sources

Information may be collected from third parties (such as hospitals or landlords) only with the individual's consent, unless required to prevent serious harm.

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6. Why We Collect Information

REF collects personal data for the following purposes:

For Clients:

- Assessing eligibility for assistance
- Delivering medical, rental, or emergency support
- Case management and follow-up
- Coordinating referrals with partner organizations
- Preventing duplication of assistance
- Analyse aggregated and anonymised information for reporting, understanding refugee healthcare needs, improving services, and informing policy development.

For Staff, Volunteers, and Contractors:

- Recruitment, onboarding, and role management
- Payroll, reimbursements, and internal administration
- Safeguarding, security, and compliance

For Donors and Funders:

- Processing, issuing receipts, and recording donations
- Financial reporting, audits, and accountability
- Donor acknowledgements and communications (where applicable)

For Partners and Caseworkers:

- Referral coordination
- Case verification and follow-up
- Partnership management

For Individuals who opt in to receive communications (including donors and non-donors) – where individuals voluntarily provide contact details:

- Receive newsletters, appeals, updates, or other information. This information is collected with consent, and individuals may opt out at any time.
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All reporting to funders or authorities is conducted using aggregated or anonymized data whenever possible.

7. Information Sharing and Consent

REF does not share personal data without informed consent, except where necessary to protect life, safety, or comply with legal obligations. When information is shared, only the minimum

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necessary data is disclosed.

For non-client data (staff, donors, partners), information sharing is limited to what is required for operational, financial, legal, or safeguarding purposes.

8. Data Security and Confidentiality

Digital Security

- Data is stored in password-protected systems
- Access is limited to authorized personnel
- Security controls and updates are applied where possible

Physical Security

- REF rarely keeps physical records
- Any paper records are stored securely and destroyed within one (1) year using secure shredding

9. Roles and responsibilities

REF Staff

- Complete mandatory training upon onboarding
- Access only the data needed for their role
- Maintain confidentiality at all times
- Report suspected data breaches immediately

Volunteers and Interns

- Have limited and supervised access to data
- Must sign confidentiality agreements
- Receive basic data protection orientation

Partners and Caseworkers

- Ensure that any personal data (including Points of Contact details) shared with REF has been collected and disclosed in compliance with applicable data protection laws, including obtaining any required consents or notices
- Must not reuse or share REF data without authorization
- Must confirm that they are authorized to provide such information to REF for the purposes of collaboration and communication.

Non-compliance may result in disciplinary action or termination of engagement.

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10. Use of Systems, Devices, and Remote Work

- REF data must be accessed only through approved systems
- Personal email or cloud storage must not be used for sensitive data
- Devices must be password-protected
- Confidential discussions should not take place in public areas
- Lost or stolen devices must be reported immediately

11. Data Breach Reporting and Response

A data breach includes loss, theft, unauthorized access, or accidental disclosure of personal data. All REF representatives must report suspected or confirmed breaches immediately. REF will assess risks, take corrective action, notify affected individuals where appropriate, and document the incident.

12. Data Retention and Deletion

Personal data is kept only as long as necessary for service delivery and legal requirements. Data is securely deleted or anonymized once it is no longer needed. Individuals may request early deletion where legally possible.

13. Individual Rights

Clients, staff, volunteers, and partners have the right to:

- Access their personal data
- Request corrections
- Request copies of records
- Limit or withdraw consent
- Ask questions about data use

Staff, volunteers, donors, and partners may also request access to or correction of their personal data, subject to legal and operational requirements. Requests are handled in line with REF procedures and applicable data protection laws, including the PDPA.

14. Complaints and Concerns

Any concerns about data protection can be raised by contacting **the Policy Focal Point:**
Name: Lovish Sekaran
Email: lovish@refmalaysia.org
Phone / WhatsApp: +61 452 639 023
REF will address concerns promptly and without retaliation.

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15. Policy Updates

REF may update this policy to reflect changes in practice, systems, or legal requirements. Updated versions will be shared publicly.

16. Acknowledgment

By receiving services from or working with REF, individuals acknowledge that they have been informed of this policy and understand how personal information may be collected and used.

Approval and Adoption

This Data Protection & Privacy Policy was approved by **Refugee Emergency Fund (REF)** and is effective from the date stated above. Compliance with this policy is mandatory for all individuals covered by it.

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Document Control

Document Title: REF Data Protection & Privacy Policy
Version: 1.0
Effective Date: 01/01/2026
Review Cycle: Every 3 years unless immediate changes are needed.
Next Review Due: 31 December 2029
Approved By: Hasan Al-Akraa
Approval Date: 6 January 2026

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