Data protection, beneficiary privacy and financial regulation for Electronic transfer

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Types of Transfers

Card based
- Mag-stripe card
- Contactless

Mobile based
- Smart card
- Mobile money
- Mobile voucher

E-voucher
A whole new global economy

Data: GSMA

Quartz | qz.com
Internet Population and Penetration

Internet Population

- about 1 million users

Internet Penetration (%)

- >80
- 60 - 80
- 40 - 60
- 20 - 40
- <20

by Mark Graham (@geolace) and Stefano De Sabbata (@maps4thought)
Internet Geographies at the Oxford Internet Institute
October 2013 • geography.oii.ox.ac.uk

data source: World Bank 2011
http://data.worldbank.org
Small pilots  

2004  

US$1.2 billion  

2014  

+5y 50% (US$10-12 billion)  

Credit: Overseas Development Institute (2015)
Financial regulations

- Sanctions

- Central banks anti-money laundering and counter-financial terrorism (AML/CFT) regulations

- KYC
Personal data includes all information that can be used to identify data subjects.
Data Privacy & Protection Risks

- Consent/Privacy Risk
- Misuse/Disclosure Risk
- Breach/Surveillance Risk
Data protection and privacy “regulatory framework”

- International Covenant on Civil and Political Rights (ICCPR)
- National Comprehensive Data Protection/Privacy Laws and Bills
- Humanitarian principles: neutrality, independency, impartiality, do no harm
- NGOs policies
- Business code of conducts/CSR
Credit: The Cash Learning Partnership (2013)
CRS best practice

• Informed consent on the use of beneficiary data

• Compliance KYC (Jordan and Greece)

• Workshop with Mercy Corps in Nigeria to talk best practice and challenges about data protection

• CRS is promoting community of practice with TROCAIRE and Nethope for technical working group.

• In future more comprehensive organizational data management policy and system with specialist resources dedicated to it
CRS data protection policy

Core Values and User Rights
1. Knowledge and Transparency
2. Agency and Control

Design Principles
Principle 1: Address Surveillance Risks
Principle 2: Limit Data Collection and Use
Principle 3: Promote and Facilitate Transparency
Principle 4: Incorporate User Feedback
Principle 5: Assume Responsibility
Privacy and Identity: Aid Building Resilient Data Infrastructure

Data Collection | Aid Decisioning and Operations | Aid Delivery | Long-Term Resiliency

Types
- Support
- Services
- In-Kind

Tools
- Envelopes
- Vouchers
- Cash
- Digital

Long-Term Resiliency
- Food
- Housing
- Education
- Health
- Sanitation
- Water
- Financial
- Savings
- Credit
- Payment
- Investments
- Protection

1. Protect Privacy
2. Empower with Interoperable Digital Identity
3. Enable Access to Digital Delivery Tools via KYC Complimenting with National Policies

Credit: MasterCard (2016)
Data Protection case study of Red Rose usage in Nigeria by CRS and Mercy Corps (ICT4D May 19 G202)

Protecting Beneficiary Privacy: Principles and operational standards for the secure use of personal data in cash and e-transfer programs (CaLP 2013)

Disasterready.org: E-Transfers and Operationalizing Beneficiary Data Protection (CaLP 2015)

ELAN Data Management and Protection Starter Kit (2016)