



# **BISAP DATA SUBJECT RIGHTS POLICY**



## **Bangladesh Integrated Social Advancement Programme (BISAP)**

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# BISAP Data Subject Rights Request Policy

At **Bangladesh Institute of Social Advancement Programmes (BISAP)**, the dignity, security, and empowerment of every individual are at the heart of our mission. We believe that the right to privacy and control over personal information is a fundamental human right. This policy ensures that all data subjects—our beneficiaries, partners, staff, and stakeholders—can exercise their rights over their personal data in a manner that is **transparent, accessible, and empowering**, in line with Bangladesh law and international standards (UN privacy principles, GDPR best practices).

## 1. Scope

1.1. Every individual whose personal data is processed by BISAP has clear rights under applicable Bangladeshi law (ICT Act 2006, Digital Security Act, and the forthcoming Data Protection Act) and aligned global standards.

1.2. Data subjects are entitled to:

- Transparent information about how their data is processed.
- Access to and copies of their data.
- Correction of inaccurate or incomplete information.
- Deletion (“right to be forgotten”) in certain circumstances.
- Restriction of processing under specific conditions.
- Data portability in a structured, machine-readable format.
- The right to object to data use, including for marketing or profiling.
- Protection from decisions made solely by automated processing.

1.3. Requests can be made **in any format**—online, in writing, or directly with BISAP staff. To encourage efficiency, individuals are invited to use our **secure online request form** available on our website.

1.4. Any staff member who receives a request is responsible for logging it immediately into BISAP’s Data Subject Rights (DSR) Register to ensure accountability.

1.5. All requests will be processed **free of charge**. Only in exceptional cases—such as repeated duplicate requests—may BISAP apply a minimal administrative fee.

1.6. Responsibility for oversight lies with BISAP’s **Data Protection Lead (DPL)**, supported by the Senior Management Team. The DPL ensures compliance, fairness, and timely responses.

## 2. Process for Response

2.1. BISAP is committed to responding **without undue delay** and within **one calendar month** of receipt of a valid request.

- **Step 1:** Record the request in the DSR Register and notify the Data Protection Lead.
- **Step 2:** Confirm the requestor’s identity (valid passport, NID, or driving license). For third-party requests, written consent from the data subject is mandatory.
- **Step 3:** Assess whether exemptions apply (e.g., public interest, legal obligations, or safeguarding). If refused, BISAP will explain clearly in writing and record the decision in the DSR Register.
- **Step 4:** Provide a full response securely within 30 days. For complex requests, BISAP may extend the timeframe by **up to two additional months**, with reasons communicated within the first month.

2.2. All communication will be **clear, respectful, and easily understood**, reflecting BISAP’s people-centered approach.

### 3. Secure Form of Response

- Responses will be shared in **plain, transparent language**.
- Where electronic delivery is appropriate, BISAP will use **secure platforms** (encrypted emails, password-protected files, or dedicated portals).
- Paper-based responses will be securely packaged and, where necessary, delivered in person.
- All communications will be aligned with BISAP's value of **protecting dignity and minimizing risk**.

## 4. Rights and Procedures

### 4.1 Right of Access

Individuals can request to see how their data is used. BISAP will provide:

- Purpose of processing.
- Types of data collected.
- Recipients or third parties receiving the data.
- Retention periods.
- Information on rights (rectification, erasure, restriction, objection).
- Sources of data (if not directly collected).
- Whether automated decision-making/profiling is used and its implications.

### 4.2 Right of Rectification

If data is inaccurate, BISAP will promptly correct it. Where necessary, corrections will also be shared with third parties who received the data. If BISAP believes the data is already accurate, the individual will be informed with a clear explanation.

### 4.3 Right of Erasure

Data will be erased when:

- It is no longer needed for the purpose collected.
- Consent has been withdrawn and no other lawful basis applies.
- The individual objects to processing and no overriding legitimate grounds remain.
- Processing was unlawful.
- Erasure is required by law.

Exemptions may apply where retention is necessary (e.g., legal claims, public records, freedom of expression).

### 4.4 Right of Restriction

Individuals may request temporary restrictions (e.g., during disputes over accuracy). BISAP will note the restriction, suspend processing where possible, and inform relevant third parties.

### 4.5 Right to Portability

Upon request, BISAP will provide personal data in a **commonly used, machine-readable format**, or directly transfer it to another organization when feasible.

### 4.6 Right to Object

Individuals may object to:

- Processing for direct marketing (which will stop immediately).

- Processing based on legitimate interest or public task, unless BISAP demonstrates overriding grounds or legal obligations.

#### 4.7 Rights on Automated Processing

BISAP does not rely on automated decision-making for critical services. If used (e.g., limited digital profiling), safeguards will always ensure:

- **Human intervention.**
- **Opportunity to express views.**
- **Right to challenge decisions.**

#### 5. Monitoring and Accountability

- BISAP's **Data Protection Lead** will track all requests in the DSR Register.
- Monthly compliance reports will be shared with the Senior Management Team.
- Lessons learned from requests will inform **continuous improvements** in data governance.

#### 6. Commitment to Dignity and Trust

At BISAP, respecting data rights is not just compliance—it is an **ethical commitment to human dignity and empowerment**. Every request is treated with seriousness, care, and respect, ensuring that individuals remain at the center of our development approach.



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Chairman - BISAP



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Chief Executive - BISAP