

MANAGING PERSONAL DATA RESPONSIBLY:

**THE WORLD BANK GROUP
PERSONAL DATA PRIVACY POLICY**

IFC Legal, Compliance Risk and ESG Sustainability (CLSVP)

MIGA Legal Affairs and Claims Group (MIGLC), MIGA Finance and Risk Management Group (MIGFR)

IBRD/IDA Senior Vice President and World Bank Group General Counsel (LEGVP)

May 2, 2018

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ACRONYMS AND ABBREVIATIONS

AI	Artificial Intelligence
AIIB	Asian Infrastructure Investment Bank
APEC	Asia-Pacific Economic Cooperation
CAO	Compliance Advisor Ombudsman (IFC/MIGA)
CBR	Business Risk and Compliance Department (IFC)
CEB	Council of Europe Development Bank
CLED	Legal Department (IFC)
CROOR	CRO Operational Risk (IBRD)
CSO	Civil Society Organization
DACO	Data Access and Control Office (IFC)
EBRD	European Bank for Reconstruction and Development
EU	European Union
ERC	Enterprise Risk Committee (IBRD)
ESM	European Stability Mechanism
GDPR	General Data Protection Regulation
GSD	General Services Department
HR	Human Resources Department
HSD	Health Services Department
IAD	Internal Audit Vice Presidency
ICSID	International Centre for the Settlement of Investment Disputes
IFAD	International Fund for Agricultural Development
IMF	International Monetary Fund
INT	Integrity Vice Presidency
ITS	Information Technology Solutions
LEGIA	Legal Vice Presidency, Institutional Administration (IBRD)
MIGFR	Finance & Risk Management Group (MIGA)
MIGLC	Legal Affairs and Claims Group (MIGA)
MDB	Multilateral Development Bank
NIB	Nordic Investment Bank
OECD	Organisation for Economic Cooperation and Development
ORC	Operational Risk Committee (IBRD)

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**“PERSONAL DATA IS THE NEW OIL OF THE INTERNET
AND THE NEW CURRENCY OF THE DIGITAL WORLD.”**

~ Meglena Kuneva, European Consumer Commissioner¹

I. EXECUTIVE SUMMARY

1. This Paper presents management’s proposals for approval of the first World Bank Group Personal Data Privacy Policy (the “Policy”).

2. Privacy, and more specifically the ability to protect personal data, has become a business imperative. Breaches are now commonplace, and have serious consequences for individuals, organizations, and society as a whole. Increasingly, companies are being held accountable for fair disclosure of personal data use; adoption of appropriate policies and safeguards to protect personal data in their possession; prompt notification of breaches; and providing appropriate remedies.

3. Within the World Bank Group (“Bank Group”), personal data has demonstrated potential to fuel operational innovation through novel financial technologies and the design and delivery of development programs. Personal data, especially when paired with technology, has expanded the frontiers of development, providing more comprehensive statistics that inform policy decisions and accelerate individuals’ access to knowledge, social connectivity, and citizen engagement.

4. Protecting personal data is not only about managing risks. It is about corporate social responsibility. It is about maintaining trust. Putting in place safeguards to protect personal data is the right thing for any responsible organization to do.

5. In this fast-changing environment where personal data is collected, analyzed, and transferred across boundaries in volumes previously unimaginable, sustaining the reputation of the Bank Group as a trusted partner demands the development of a stronger, modernized personal data management regime. Effective management of personal data underlies fintech, data analytics, AI,

¹ Roundtable on Online Data Collection, Targeting and Profiling, Brussels, March 31, 2009.

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and other technology solutions. These solutions are essential to the continued relevance of Bank Group operations, including maximizing finance for development. Personal data also plays a key role in the Bank Group’s operational and transaction work, procurement, household surveys, safeguards, and integrity and compliance functions. At the most basic level, improved personal data management will help protect the people most vital to the Bank Group’s mission: the staff – at headquarters and in offices around the world – who perform the work, and the people who benefit from the Bank Group’s development projects.

6. New regulations around the world are compounding this urgency. Today, approximately 100 countries have adopted regulations that address privacy and personal data protection, most based on international standards that share a common core of principles.² While jurisdictions vary in their interpretation and implementation of these principles, organizations that address these core principles are much more likely to align with existing and evolving acceptable personal data practices. These core principles form the heart of the proposed Policy, as further described in Section V and included in draft form in Annex 1. The Bank Group is not alone; other MDBs are also strengthening their privacy frameworks (see paragraph 20).

7. The newest regulation is the European Union’s (EU) General Data Protection Regulation (GDPR). When it becomes effective on May 25, 2018, GDPR will levy hefty fines³ on EU-based businesses that do not ensure compliance by their partners to whom they transfer personal data. Transfers of personal data to international organizations are expressly subject to regulation under GDPR. The Bank Group collectively has over 15,000 clients and partners based in the EU.

8. There is no direct application of privacy laws and regulations to the institutions of the Bank Group because of their privileges and immunities as international treaty-based organizations. However, if the Bank Group cannot demonstrate to its clients and partners worldwide that it takes the protection of personal data seriously, its ability to do business with these counterparties is at risk.

² International standards reflecting common core principles are included in the following important global frameworks: (i) the Organisation for Economic Co-Operation (OECD) Privacy Framework (1980, updated 2013); (ii) Council of Europe Treaty No. 108 (Convention for the Protection of Individuals with regard to the Automatic Processing of Personal Data) (1981); and (iii) the Asia-Pacific Economic Cooperation (APEC) Privacy Framework (2005, updated 2015).

³ The greater of 20 million Euros or 4% of global turnover.

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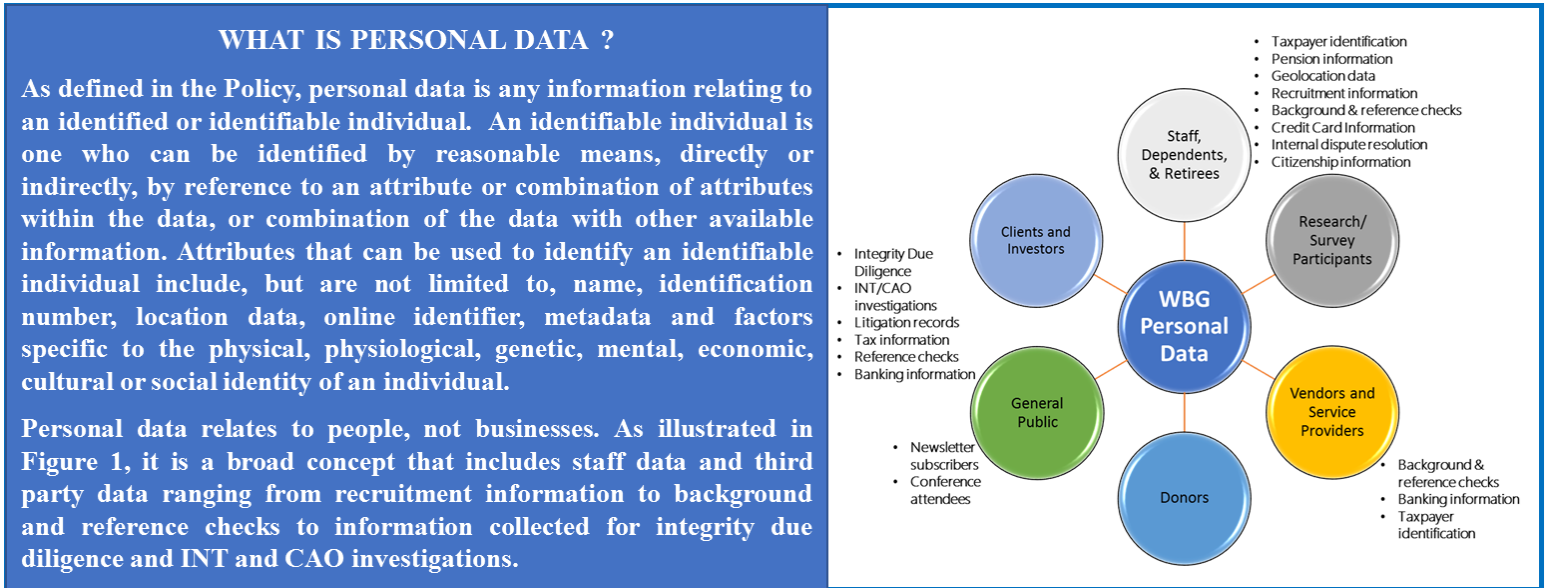
9. To be responsive to this new environment, there is an imminent need for the Bank Group to adopt a privacy policy. A new privacy policy will address potential risks by (a) providing assurance to its clients and partners that they can continue to engage with the Bank Group; (b) honoring the protections for staff personal data as embodied in the institutions' principles of staff employment; (c) allowing the Bank Group to maintain thought leadership on privacy and personal data; and (d) supporting the development, due diligence, and research approaches that depend on the institutions' ability to gather personal data.

10. Tailored to the mission and mandate of each Bank Group institution, and responsive to the needs of their clients and partners, the Bank Group institutions have developed a privacy policy for approval by their Boards, as described in Annex 1. The Policy will provide the foundation for comprehensive privacy programs, including the development of appropriate organizational and technical safeguards tailored to each institution, to be implemented by the end of FY20. The Policy also will articulate guiding principles for the adoption of directives, procedures, and guidance under the Policies and Procedures Framework of each institution.

11. Management recognizes the evolving nature of privacy and personal data concerns, the likelihood of public interest in the Policy, and the possible impact of the Policy on the Bank Group's digital transformation strategy. Accordingly, the Bank Group institutions also propose to provide status updates to the Boards in January 2019, and again in January 2020, with periodic updates as warranted, as described in paragraph 37.

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Figure 1



II. BACKGROUND

12. The need for personal data protection has increased substantially over the past several years. With breaches such as the Yahoo! incident, which affected one billion accounts in 2016, and the more recent Facebook/Cambridge Analytica breach, and strong reaction from regulators, expectations that public and private sector organizations will manage personal data responsibly are at an all-time high. It is imperative that each institution adequately protect personal data to avoid disruption of its operations and to safeguard the institution from significant risks as outlined in Section IV.

13. In March 2017, IFC’s Data Access and Control Office (DACO)⁴ began researching the impacts of GDPR and other regulations, and partnering with ITS to conduct a personal data inventory. It cast a wide net in its assessment of the impacts, engaging external legal counsel to analyze IFC immunities relating to GDPR in particular and to prepare a memo outlining personal data protection compliance standards relevant to IFC.

⁴ DACO was established in January 2017 as part of the Business Risk and Compliance Department in the Legal, Compliance Risk and ESG Sustainability Vice-Presidency, IFC.

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14. In early September 2017, following a review of DACO’s analysis, IFC’s General Counsel proposed a joint working group to the General Counsels of IBRD/IDA (the “World Bank”) and MIGA. This led to the creation of a World Bank Group Privacy Policy Working Group (the “Working Group”)⁵, mandated to develop a set of foundational privacy principles, consistent across the Bank Group institutions. These principles would serve as the cornerstone for the development and implementation of institution-specific privacy programs.

15. The Working Group met formally six times, including three half-day policy drafting sessions. As part of the socialization process, the Working Group shared the draft Policy with CROOR, HR, HSD, GSD, IAD, INT, and CAO. IFC also shared the draft with a privacy stakeholder group consisting of approximately 75 members from across IFC in headquarters and field offices.

16. Since September 2017, the World Bank also began to study the potential impact of GDPR specifically, and privacy laws generally, on the World Bank’s business and operations. As part of this assessment, the World Bank hired external counsel to provide advice on personal data protection issues, including an analysis of the potential risks posed to the World Bank, and some proposed risk mitigation steps. The World Bank also completed a preliminary personal data inventory, by asking various business units at the World Bank to indicate whether they engage in processing personal data, and how they treat this personal data. ITS also performed a preliminary gap analysis to evaluate whether existing controls, in terms of both processes and technology, would allow compliance with a personal data protection program.

17. On March 16, 2018, the General Counsels of IFC and MIGA, supported by the World Bank, co-chaired a Technical Briefing for Board officials to provide an overview of management’s ongoing work on the Policy.

⁵ Working Group membership included representatives from: IFC (CBR, CLED); IBRD/IDA (LEGIA); MIGA (MIGLC, MIGFR); ICSID; ITS; and GSD.

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18. On April 6, 2018, the Working Group recommended a consensus draft World Bank Group Personal Data Privacy Policy for consideration by the management teams of their respective institutions.

III. COLLABORATION

19. ***Internal Bank Group Stakeholders:*** In November/December 2017, the World Bank invited IFC to present its overall privacy program to its Operational Risk Committee (ORC) and Enterprise Risk Committee (ERC). Since that time, IFC and MIGA have been closely collaborating with ICSID and the World Bank's LEGIA and CROOR departments on both the Policy, as noted above, and an overall privacy program. With regard to the privacy program, IFC and MIGA have consulted other internal stakeholders who are likely to collect or use personal data in carrying out their official business. Stakeholders included:

- Operational teams that handle personal data received from clients and partners;
- Human Resources teams that handle staff personal data;
- Procurement teams that handle personal data from vendors;
- Investigative and compliance teams that handle personal data relating to internal or external investigations and integrity due diligence (IDD);
- Information Technology teams who handle personal data of users while supporting day-to-day operations; and
- GSD teams that handle and process personal data of staff and contractors to provide key services such as corporate security, travel, visa processing, mailing, and shipping.

There will be an ongoing process of consultation after the Policy is approved.

20. ***Alignment with other Multilateral Development Banks (MDBs):*** The Bank Group institutions have had extensive discussions with other international finance institutions and MDBs including EBRD and IMF, as well as within the UN system (through the UN Global Pulse), regarding appropriate privacy standards for international organizations. On March 26-27, 2018, IFC and EBRD co-hosted a 1½ day Privacy Symposium to better understand concerns and align

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in critical areas. Attended by five other international finance institutions and MDBs⁶ as well as the World Bank and MIGA, this was the first in what will be a series of meetings to discuss specific privacy topics, such as industry best practices for MDBs. The next meeting is tentatively scheduled for September/October in Paris. Participants reached broad agreement, on a working level, on the criticality of aligning with industry practice on safeguarding personal data, and the need for a phased approach to implementation of governance frameworks, technical controls and change management.

IV. RISKS DRIVING THE NEED FOR A POLICY

21. The Bank Group institutions believe that a Policy is required with urgency to address key risks.

22. **Operational Risks:** If the Bank Group is perceived to lack appropriate standards for the protection of personal data, either business partners may not provide personal data that is required for the institutions' activities or, if they do provide such data, they risk incurring hefty fines. Business activities that incorporate personal data in the normal course (such as names, addresses, contact information, and activity logs collected by Bank Group systems), and efforts to collect or acquire personal data to achieve evidence-based development impact, may be frustrated if the Bank Group does not internalize the Principles (as defined in paragraph 24) into their normal business practices. The Bank Group may also be frustrated in their use of new technologies (AI, Internet of Things, etc.) that rely on acquisition, collection, and use of personal data.

23. **Non-Operational Risks:** There are multiple non-operational risks including:

- a. **Reputational Risks:** Bank Group institutions are reputationally committed to high environmental, social and governance standards, as well as transparency in operations within their Access to Information undertakings. Public perception that the Bank Group does not abide by or respect established privacy principles could result in a severe loss of public confidence.

⁶ Asian Infrastructure Investment Bank (AIIB), European Stability Mechanism (ESM), Council of Europe Bank (CEB), Nordic Investment Bank (NIB), International Fund for Agricultural Development (IFAD).

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- b. ***Risk to Thought Leadership and Operational Design:*** The Bank Group has prioritized a digital transformation agenda. The Policy will establish Bank Group leadership in a critical area of concern to its clients and partners. The implementing program also will reinforce its credibility and expertise in key related areas, such as information and cybersecurity governance; anonymization and masking technologies; and use of personal data in AI solutions.

V. THE PROPOSED PERSONAL DATA PRIVACY POLICY

24. The core of the Policy (see Annex 1) is the seven privacy principles (the “Principles”) found in its Section III (Scope), which will form the cornerstone of each institution’s privacy programs. The Working Group drafted the Principles to align with global standards for personal data protection⁷, keeping in mind each institution’s status as an international organization.

25. The high-level concepts embodied by the Principles are designed to address the risks associated with mishandling personal data by establishing baseline practices aligned with international standards. From this baseline, each institution will develop more specific, internal guidance comprising institution-specific directives, procedures, and guidance consistent with the Policies and Procedures Framework. The following examples illustrate how the implementation process will work in practice:

- a. ***The first sentence of Principle 1 (Legitimate, Fair and Transparent Processing) states that “Personal Data shall be Processed for legitimate purposes⁸ and in a fair and transparent manner in accordance with this Policy.”*** One baseline established by this Principle is that personal data must be processed in a transparent manner. Bank Group institutions are not subject to national regulations and

⁷ The Working Group developed the Principles based on core principles included in influential international standards such as the OECD Privacy Framework, Council of Europe Treaty No. 108, and the APEC Privacy Framework that have been highly influential on the development of data protection regulations around the world. The Working Group was assisted by the external legal counsel memo outlining personal data protection compliance standards referred to in paragraph 13.

⁸ Legitimate purposes under the draft Policy mean any purpose: (a) carried out with the consent of the individual whose personal data is being processed; (b) in the vital or best interest of (i) the individual whose personal data is being processed or (ii) of another person; (c) necessary for the performance of a contract or compliance with a binding obligation or undertaking; or (d) consistent with, or reasonably necessary to enable a Bank Group Institution to carry out its mission, mandate or purpose as an international organization established by its member countries.

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regulatory guidelines that typically set out the specific requirements of the transparency principle. Accordingly, the appropriate level of transparency will be set forth in each institution's implementing instruments according to the sensitivity and nature of the processing involved. For example, each institution may need to give specific notice to individuals regarding how their personal data will be processed in ordinary commercial settings where purpose-specification is consistent with market practice. In other cases (e.g., sensitive IDD and investigations involving allegations of fraud), more general disclosure of each institution's policies and practices may be appropriate (e.g., to prospective clients and partners at the outset of the relationship).

- b. *Principle 6 (Transfer of Personal Data) states that "Personal Data shall only be transferred to third parties for legitimate purposes and with appropriate regard for the protection of Personal Data."* The baseline set by this Principle is "appropriate regard" for the protection of personal data. The meaning of appropriate regard may vary according to specific situations (e.g., whether the information is being transferred to private entities – vendors, partners, clients – or to public entities – member countries, donors), and the sensitivity of the information involved. Each institution will address these various scenarios in the implementing instruments, consistent with responsible personal data protection practices, and the expectations of their stakeholders.

26. This formulation – high-level baseline Principles approved by the Boards of each Bank Group institution with more specific implementing guidance developed and approved by management at an institution level – will provide appropriate flexibility to each Bank Group institution to operationalize the Policy as appropriate for its unique mandates and business needs. Once approved by the Boards, operationalizing the Policy through specific guidance to staff will take time. The foundational nature of the Principles must be distilled into specific guidance that instructs staff to internalize the Principles into their daily activities and, as this is the first ever privacy policy focusing on all Bank Group activities, many existing policies and procedures will require adjustment to incorporate the high-level concepts embodied by the

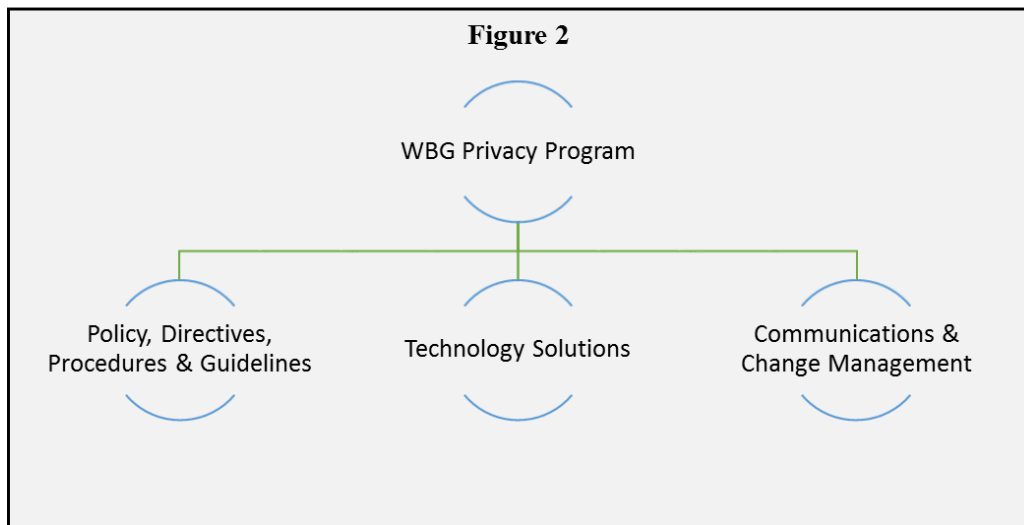
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Principles. For these reasons, the Bank Group institutions have drafted the Policy to have a dynamic application date, tied to the adoption of implementing instruments, to reflect that changes in business and IT processes will be phased in over the implementation period. While the Policy application date is dynamic, it is important to prevent an implementation period of indefinite length. With this in mind, Section VI of the Policy gives each institution two years after Board approval to implement the Policy based on its own respective roadmaps, after which point the Policy will be apply in all cases.

27. Consistent with the approaches other MDBs plan to take, the Policy is forward-looking and will not apply to historical data. Importantly, the Principles will enable each institution to mitigate privacy risk by requiring more deliberate attention to privacy in the early stages of any new operation involving personal data (often called “privacy by design”). In this way, the Policy will be an important enabler of key projects, particularly technological and research initiatives relying on “big data” that are becoming more prevalent and useful in Bank Group’s operations.

VI. IMPLEMENTATION & SCOPE OF THE POLICY

28. ***Two-Year Implementation Strategy:*** Implementation of the Policy will be phased over two years while each institution builds its program in line with the Policy. These programs will be



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designed to maintain client/partner trust by demonstrating that each institution has a mature data protection regime in place. To do this, each privacy program will focus on three key areas:

29. ***Costs and Staff Resources:*** Each Bank Group institution will require a commitment of resources (IT budget and staff) over multiple years for implementation and to support continuing data protection operations following implementation. The full scope and size of Bank Group activities utilizing personal data is not yet known due to ongoing efforts around data discovery (see paragraph 32-33 below). The scope and size will likely increase over the implementation period, resulting in an unpredictable increase in incremental costs and resources.

- a. ***IFC and MIGA:*** DACO for IFC and MIGFR/MIGLC for MIGA will absorb the majority of staff costs, but additional resources may be required over time. Based on senior management support, IFC and MIGA believe that sufficient resources will be found if required. With regard to budget, IFC has included costs for new encryption and anonymization capabilities within IFC's FY19 IT Annual Investment Plan. MIGA will reflect any additional costs for new technologies, as appropriate, in its budget as well.
- b. ***The World Bank:*** World Bank Management has decided to implement the Policy by establishing a Data Privacy Office initially staffed by a new Data Privacy Officer with experience in personal data protection practices and an administrative resource. In order to maintain independence, the Data Privacy Office will report administratively to the Vice President, Compliance, a new function which will be occupied by the Senior Vice President and General Counsel. The Data Privacy Officer also may work with World Bank councils or committees, as needed to assist it in establishing and implementing the privacy program.

30. The collaboration demonstrated between the Bank Group institutions to this point will continue throughout the implementation period and beyond, to ensure consistency and minimize duplication and overlap.

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31. ***Directives, Procedures and Guidelines:*** The Board-approved Policy will be a principles-based document that is published externally. As noted above, each institution will be responsible for operationalizing the Policy and drafting its own directives, procedures and guidelines, as well as reviewing and updating existing policies and procedures to conform to the new Policy. Each institution will continue to coordinate where practicable to minimize any variance in approach. Where there is impact on shared services (e.g., HR, GSD or ITS) all institutions will work closely to ensure a mutually acceptable outcome.

32. ***Technology Solutions:*** ITS has been an active member of the Working Group and has been partnering closely with each institution to undertake its own data discovery projects. Data discovery (or data inventory) is critical to identify the personal data held by each institution, including information on where it comes from, where it is stored, how it is used internally, and whether it is shared externally. The initial data inventory work is now nearly complete, and operational and ITS teams are now assessing risks and gaps against the ITS security architecture and mapping them to the Principles contained in the Policy.

33. In addition to data discovery, ITS' Information Security Unit is working closely with each institution to draft practical guidance to technical teams for the appropriate collection, storage, and treatment of personal data. This guidance may include the implementation of additional controls for some systems, based on risk assessments. The overall implementation plan for technical controls is intended to be a multi-year phased approach. The initial phase will focus on improving and maturing key areas such as:

- a. *Access management* – resulting in enhanced confidentiality and integrity of personal data, reducing likelihood of disclosure and breaches,
- b. *Content controls* – enhanced content controls such as data masking and encryption to reduce the risk of unauthorized access,
- c. *Information handling and management* – ability to classify and tag personal data to enable system and process level controls, and
- d. *Event logging* – improved ability to detect and respond to incidents, anomalous activities.

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34. *Awareness, Communications and Change Management:* All Bank Group institutions are working together to coordinate both external and internal communications. Efforts to manage the communication of the Policy to external stakeholders will include accessible information about the Policy and relevant downstream processes on each institution's external website. Internally, awareness raising and training of staff on how to advise clients, vendors and other stakeholders about the Bank Group's privacy approach, as well as development of clear and standardized language on privacy in legal agreements, are already in progress.

VII. RECOMMENDATION & REQUEST FOR APPROVAL

35. The Boards' approval of the Policy will demonstrate that the Bank Group takes data privacy seriously and is committed to protecting personal data in line with global personal data protection standards. The Boards' approval also will signal to staff, clients, donors, vendors, and civil society that the Principles set forth in the Policy have the support of the community of member countries. Finally, the Boards' approval will provide clear direction and support to the Bank Group institutions as they move forward to implement their respective privacy programs.

36. Accordingly, IFC, MIGA, and the World Bank recommend that their Boards approve the Policy described in section V. As with other new Board-approved policies, following approval, Bank Group management plans to publicly disclose the Policy.

37. The Bank Group institutions propose that each institution revert to their Boards with updates in January 2019 and January 2020. The updates will focus on implementation status and Policy efficacy.

Annex 1: DRAFT Policy: Personal Data Privacy

Policy:

Personal Data Privacy

Information Classification Designation

Public

Catalogue Number

Assigned by the P&PF Administrator within LEGVPU

Issued

[Insert date]

Content

Policy setting forth the core privacy principles governing the Processing of Personal Data by WBG Institutions.

Applicable to

IBRD, IDA, ICSID, IFC and MIGA

Issuer

The Board

Sponsors

For IBRD/IDA: Senior Vice President and General Counsel

For ICSID: Senior Legal Adviser, Institutional Affairs

For IFC: Vice President, Legal, Compliance Risk and ESG Sustainability and General Counsel

For MIGA: Director and General Counsel, Legal Affairs and Claims; and Director, Finance and Risk

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SECTION I – PURPOSE AND APPLICATION

1. This Policy sets forth Principles governing the Processing of Personal Data by WBG Institutions.
2. This Policy is intended to ensure consistent practices, aligned with recognized international standards, for the Processing of Personal Data by WBG Institutions.
3. This Policy applies to WBG Institutions.

SECTION II – DEFINITIONS

As used in this Policy, capitalized terms or acronyms have the meanings set out below:

1. **Board:** the Boards of Executive Directors of International Bank for Reconstruction and Development (IBRD) and International Development Association (IDA); the Secretary-General of International Centre for the Settlement of Investment Disputes (ICSID); and the Boards of Directors of International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA).
2. **Implementing Documentation:** has the meaning set forth in Paragraph 1 of Section VI below.
3. **Personal Data:** any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified by reasonable means, directly or indirectly, by reference to an attribute or combination of attributes within the data, or combination of the data with other available information. Attributes that can be used to identify an identifiable individual include, but are not limited to, name, identification number, location data, online identifier, metadata and factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of an individual.
4. **Policy:** Policy: Personal Data Privacy, [date], Catalogue No. []
5. **Principles:** the core Personal Data privacy principles set forth in Section III (Scope).
6. **Processing:** any operation or set of operations, automated or not, which is performed on Personal Data, including but not limited to collection, storage, use, transmission, disclosure or deletion.
7. **WBG Institution:** any one of IBRD, IDA, ICSID, IFC and MIGA.

SECTION III – SCOPE

The following Principles shall apply to all Processing of Personal Data by WBG Institutions:

1. **Legitimate, Fair and Transparent Processing**

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Personal Data shall be Processed for legitimate purposes and in a fair and transparent manner in accordance with this Policy. Legitimate purposes for Processing of Personal Data mean any purpose:

- a. carried out with the consent of the individual whose Personal Data is being Processed;
- b. in the vital or best interest of (i) the individual whose Personal Data is being Processed or (ii) of another person;
- c. necessary for the performance of a contract or compliance with a binding obligation or undertaking; or
- d. consistent with, or reasonably necessary to enable a WBG Institution to carry out, its mission, mandate or purpose as an international organization established by its member countries.

2. Purpose Limitation and Data Minimization

Personal Data shall be collected for one or more specific and legitimate purpose(s) and not further Processed in a manner that is incompatible with the original purpose(s) for which it was collected; further Processing for archiving purposes, research, or statistical purposes shall not be considered incompatible with the original purpose. In amount and type, Personal Data collected shall be necessary for and proportionate to the legitimate purpose(s) for which they are Processed.

3. Data Accuracy

Personal Data shall be recorded as accurately as possible and, where necessary, updated to ensure it fulfills the legitimate purpose(s) for which it is Processed.

4. Storage Limitation

Personal Data shall be kept in a form which permits identification of individuals only so long as necessary for the fulfillment of the purposes for which it was collected or for compatible further Processing in accordance with this Policy.

5. Security

Personal Data shall be protected by appropriate technical and organizational safeguards against unauthorized Processing and against accidental loss, destruction or damage.

6. Transfer of Personal Data

Personal Data shall only be transferred to third parties for legitimate purposes and with appropriate regard for the protection of Personal Data.

7. Accountability and Review

Each WBG Institution shall adopt mechanism(s) to:

- a. oversee compliance with this Policy; and

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- b. provide individuals with a method, subject to reasonable limitations and conditions, to:
 - i. request information regarding the individual's Personal Data Processed by such WBG Institution; and
 - ii. seek redress if the individual reasonably believes that the individual's Personal Data has been Processed in violation of this Policy.

SECTION IV – EXCEPTION

N/A

SECTION V – WAIVER

Provisions of this Policy may be waived by the Board.

SECTION VI – OTHER PROVISIONS

1. This Policy shall be implemented by each WBG Institution through directives, procedures and guidance tailored to each WBG Institution's specific operations (the "**Implementing Documentation**").
2. This Policy shall apply to each WBG institution at the earlier of: (i) a public declaration of effectiveness by the Sponsor to the Issuer of the Policy upon adoption and effectiveness of Implementing Documentation or (ii) two years from the effective date of this Policy. This Policy shall not cover Personal Data collected before the date of application. Directives and Procedures under this Policy may extend to such Personal Data.
3. The Processing of Personal Data in accordance with this Policy is without prejudice to the privileges and immunities of the WBG Institutions, which privileges and immunities are specifically reserved.

SECTION VII – TEMPORARY PROVISIONS

N/A

SECTION VIII – EFFECTIVE DATE

This Policy is effective as of the date on its cover page.

SECTION IX – ISSUER

The Issuer of this Policy is the Board.

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SECTION X – SPONSORS

The Sponsors of this Policy are:

- IBRD/IDA: Senior Vice President and General Counsel
- ICSID: Senior Legal Adviser, Institutional Affairs
- IFC: Vice President, Legal, Compliance Risk and ESG Sustainability and General Counsel
- MIGA: Director and General Counsel, Legal Affairs and Claims; and Director, Finance and Risk

SECTION XI – RELATED DOCUMENTS

1. Public Documents
 - a. IBRD Access to Information Policy
 - b. IFC Access to Information Policy
 - c. MIGA Access to Information Policy
 - d. Integrity Vice Presidency Policy on Disclosure of Information
 - e. Independent Evaluation Group Access to Information Policy
2. Restricted Documents
 - a. Principles of Staff Employment
 - b. Staff Rules

Questions regarding this Policy should be addressed to the Sponsors.