This privacy policy ("Privacy Policy") constitutes a legally binding agreement made between you, ("you") and the Central Inspection ("we," “us”, “our” or “CI”), concerning your access to and use of the daem.impact.gov.lb desktop website and mobile website (collectively, the “Platform”, or “Site”).

This Privacy Policy covers the processing of personal data pertaining to citizens in relation to two aid programs, namely the Broad Coverage Cash Transfer Program (also herein referred to as the ration card program) financed by the Lebanese Government and the Emergency Social Safety Net (ESSN) financed by the World Bank.

Personal data is any information that helps to directly or indirectly identify a natural person, by comparing the data or overlapping data collected from multiple sources. The Privacy Policy does not cover data through which the identification of a natural person is not possible, and which can be made available to the public.

We are committed to privacy rights of the users and visitors of the Site as mentioned in this Privacy Policy. The purpose of this Privacy Policy is to give you confidence as you use the Platform and to exhibit our commitment to protecting your privacy. The Privacy Policy is only applicable to the Platform’s direct services and does not extend to any other website or digital service that you may access through our platforms (if any), each of which may have their own privacy policies that differ from this one. This Privacy Policy relates solely to the online information collection and use practices of this Site. We recognize that you may be concerned about the information you provide us, and how we manage it. This Privacy Policy has been established to address those concerns.

By using the Platform and services you agree to the policies outlined in this Privacy Policy and consent
Please read this policy carefully so that you can understand what our policy and procedures are:

DATA COLLECTION AND USE

The Platform collects information:

a. when you visit and use the Platform;
b. when you create an account to apply for the Emergency Social Safety Net program (ESSN) or the Wide Coverage Cash Assistance program (ration card) and fill the required forms;
c. when you edit your account information;
d. through website analytics services and other technologies; and
e. when you send us an email or contact us in any other method.

We will collect and process various types of personal data about you as detailed below:

a. Personal status information (e.g., full name, date of birth, gender, marital status, number of children);
b. Address;
c. Contact details (e.g., email address and telephone numbers);
d. Identification details (e.g., identification card number, passport number);
e. Housing conditions (e.g., number of rooms, surface);
f. Financial information (e.g., number of bank accounts, amount in bank accounts, IBAN);
g. Employment status (e.g., sector, salary, working hours, other sources of income);
h. Personal information pertaining to your family members (e.g., personal status information, identification details, financial and employment status);
i. Fiscal information (e.g., fiscal number);
j. Number of vehicles owned;

المصطلحات الخاصة بالمصطلحات الأخرى، تأتي إلتزامك بالامتثال يقلل من سهولة سياسة الخصوصية هيئة عندًا. تطلق هذه السياسة علىكم كمستخدمي المنصة.

الرجاء قراءة هذه السياسة جيدًا لمعرفة وفهم ماهية سياستنا وإجرائنا.

جمع البيانات واستخدامها

تقوم المنصة بجمع المعلومات:

أ. عندما تزورون ومستخدمون المنصة؛
ب. عندما تخلتفون قسماً تقدم طلب استفادة من برنامج شبكة الإستفادة الاجتماعي الاجتماعي (ESSN) أو برنامج التغطية الواسعة للمساعدة النقدية (البطاقة التمويلية) وتعزون استمرار المنصة؛
ج. عندما تتعاملون في معلومات حسابكم؛
د. من خلال خدمات الهندسة التحليلية للموقع الإلكتروني و غيرها من التقنيات المعلوماتية؛
ه. عندما ترسلوننا عبر البريد الإلكتروني أو تتصلكون لنا بأي وسيلة أخرى.

نقوم بجمع ومعالجة أنواع مختلفة من البيانات الشخصية التي تخصكم، وهي تشمل:
أ. معلومات متعلقة بالأحوال الشخصية (مثلًا: الاسم الكامل، تاريخ الولادة، الجنس، الحالة الزوجية، عدد الأطفال)؛
ب. العنوان؛
ج. معلومات الاتصال (مثلًا: البريد الإلكتروني وأرقام الهاتف)؛
د. تفاصيل التعريف (مثلًا: رقم وثيقة الهوية، رقم جواز السفر)؛
ه. ظروف السكن (مثلًا: عدد الغرف، المساحة)؛
و. معلومات حول الحالة المالية (مثلًا: عدد الحسابات المصرفية، مقدار المبالغ في الحسابات المصرفية، IBAN)؛
ز. الحالة الوظيفية (مثلًا: القطاع، العمل، مصادر الدخل الأخرى)؛
ح. المعلومات الشخصية المتعلقة بأفراد عائلتك (مثلًا: معلومات متعلقة بالأحوال الشخصية، تفاصيل التعريف والتفاصيل المالية والوظيفية)؛
ط. معلومات أخرى (مثلًا: الرقم المالي)؛
ي. عدد المرتكبات الممتلكة؛
ك. توظيف عمال/عمالات منزل؟
ل. الوصول إلى بروتوكول الإنترنت؛
م. نوع الجهاز وأسسه؛
ن. نوع برامج التصفح ونسخة.
k. Employment of domestic workers;
l. Internet Protocol access;
m. Device type and name;
n. Browser type and version;
o. Pages that are visited and time spent on
   the platform;
p. Date and time of visit;
q. Device operating system and version; and
r. Telecommunication service provider.

The forms on the Platform are optional and if the
user chooses to respond, their response shall be
registered. However, choosing not to answer will
affect usage of the Platform and limit the necessary
assessment to determine access to aid.

If you choose to fill the forms on the Platform on
behalf of someone else, you warrant that you
obtained the approval from the person to do so.

We will use your personal data provided to us for
the below purposes:

a. Properly and fairly map household need
   for financial assistance;
b. Determine the households eligible to
   benefit from the aid programs;
c. Complete aid disbursement; and
   d. Any other purpose stated in this Privacy
      Policy.

DATA PROCESSING

We will ensure that your personal data is
processed in a manner that is compatible with the
purposes indicated above.

For the stated purposes, your personal data will be
disclosed to the parties mentioned below. While
some parties will have access to parts of the data
for validation purposes, other parties will have
access to the data on a need-to-know basis for
support purposes. The National Poverty Targeting
Program will also have access to the data for the
implementation of the ESSN program.
1. Parties with access for validation

Personal information that is entered while filling out the forms on the Platform will be validated by the competent institutions. It is important to note that these institutions will only have access to the data that is relevant to their mandate. These institutions are the following:

a. The General Directorate of Civil Status within the Ministry of Interior and Municipalities to validate personal status information such as name and identification card number;

b. The Lebanese Central Bank and banking institutions to validate financial information such as IBAN, bank accounts and amount contained therein;

c. The Traffic Management Organization within the Ministry of Interior and Municipalities to validate information pertaining to vehicles;

2. Parties with access for technical support

Dedicated units within the Central Inspection will have access to personal information on a need-to-know basis to provide support to citizens encountering issues while filling out the forms on the Platform, and to subsequently assess any other problems which may be causing the reported issue.
3. Access for ESSN implementation

The National Poverty Targeting Program, which is run by the Presidency of the Council of Ministers and the Ministry of Social Affairs will have access to the collected personal data. The personal data will be utilized to implement the ESSN, which is part of the National Poverty Training Program.

Your personal data will be processed by the parties specified in this section when applicable, subject always to restrictions regarding confidentiality and security in line with applicable local data protection laws and regulations.

The decision on eligibility to benefit from the aid programs is solely based on automated processing of the entered data.

We will not disclose your personal data to third parties who are not authorized to process them.

Data that is not personal and that cannot be used to directly or indirectly identify you, may be shared and accessible by the public for their information and use. For instance, public dashboards displaying metrics of interest to the public (e.g., proportion of households below the poverty line) may be made available to the public without disclosing any personal data.

RETENTION AND STORAGE OF DATA

The Government of Lebanon is the owner of the data collected through the Platform. We will retain and use your personal data as long as necessary to fulfill the purposes indicated above, enhance user experience and use of the Platform, comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. The equipment and main server will be placed within the Ministry of Telecommunications–OGERO and will be encrypted pursuant to high security measures under the management and governance of the...
Central Inspection. The Central Inspection is responsible for the design, roll-out, operation and management of the Platform. Direct access to the database will not be allowed in any circumstance.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Platform, or when legally obligated to retain this data for longer time periods.

DATA PROTECTION AND SECURITY

The Central Inspection takes safeguards to protect the collected information on secure servers in OGERO. It has put in place procedures and technologies as per good industry practices and in accordance with applicable laws, to maintain security of all data from the point of collection to the point of destruction.

Although we take high measures in securing the collected information, we cannot totally guarantee its security.

ACCESSING AND MODIFYING INFORMATION

Non-personally identifiable information may be shared on the Platform and may be accessible by any individual.

You, and any of your heirs, can access the collected data and may request the data protection officer, whose details are below, to hand over the purposes, categories, source, subject and nature of the processing, identification of the persons and their categories to whom the personal data is being sent or those who can access the same, as well as the timing and purposes of such access.

You, or any of your heirs, can ask the data protection officer to correct, complete, update and erase personal data, which is incorrect, incomplete, ambiguous, expired or incompatible with the purposes of processing, or the data that is

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You, or any of your heirs, can ask the data protection officer to correct, complete, update and erase personal data, which is incorrect, incomplete, ambiguous, expired or incompatible with the purposes of processing, or the data that is
not to be processed, collected, used, saved or transferred.

You, and any of your heirs, will be required to present sufficient documentation to verify your identity to access and modify your information.

We will notify any third-party entity that has access to the data of the amendments made at your request or any of your heirs.

RIGHT TO OBJECT
You may object before the data processing officer whose details are below, for legitimate reasons, to the collection and processing of your personal data. However, you will cease to be entitled to the right to object in the following circumstances:

a) When the Central Inspection is mandated by law to collect and process your personal data; or

b) When you have agreed to the processing of your personal data.

CONTACT US
If you have any queries about how we use your personal data or the data we have about you, you can contact us by email or post as follows:

Central Inspection
Data Protection Officer
Baydoun building, Bordeaux Street
Verdun - Beirut
Lebanon
Email: info@cib.gov.lb