WORLD BANK PRIVACY NOTICE

Grievance Redress Service (GRS)

March 6, 2023

The International Bank for Reconstruction and Development and the International Development Association (also known as the "World Bank") respect your privacy. This Privacy Notice applies to the processing of your personal data in the context of a complaint submitted to the Grievance Redress Service (GRS). For the purpose of this Privacy Notice, "personal data" means any information relating to an identified or identifiable individual.

PURPOSE OF PROCESSING YOUR INFORMATION

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. It aims to enhance the World Bank's accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed.

We collect and process personal data because it is necessary to enable us to carry out the mandates set forth in the GRS <u>Procedure</u> and <u>Directive</u>. Personal data we process include names, contact details, and documentation or information related to your complaint. The GRS may request additional information from complainants or their authorized representatives if this information is deemed necessary to process complaints. Please do not share unsolicited personal data if it is not needed for the processing of your complaint by the GRS.

HOW WE WILL USE YOUR PERSONAL DATA

Your personal data will be used by the GRS to process your complaint in accordance with the GRS <u>Procedure</u>. The GRS treats all complaints as confidential.

The GRS uses anonymized data from the complaints it receives for analytical assessments, institutional learning and reporting purposes. This may include analyzing trends observed in complaints, identifying recurring issues, preparing monthly status reports and other products. The GRS publishes information related to the cases it is processing on the <u>GRS website</u> (e.g., in monthly case logs and annual reports). This information is redacted as necessary to protect the identity of complainants.

INFORMATION WE SHARE

We do not sell or otherwise disclose your personal data collected, except as described in this Privacy Notice. The GRS is functionally separate from World Bank teams tasked with preparing and supporting projects in the World Bank's organizational structure. It relies on other World Bank units for appropriate follow-up on the issues raised in complaints. We may share your personal data with other World Bank units if the complaint is processed further by the GRS. World Bank units will in turn process your personal data in accordance with the WBG Personal Data Privacy Policy. The GRS marks all communications to World Bank staff about complaints as confidential.

The GRS will seek your written consent for the World Bank to share your personal data with third parties outside the World Bank for follow-up on the issues raised in your complaint. Such "third parties" may include, but are not limited to, the relevant government counterparts and/or entities involved in the implementation of World Bank-supported projects, the entity about which the complaint is being made, government agencies, national or local administrations, project contractors or sub-contractors, project-level grievance mechanisms and other accountability mechanisms processing the complainant's case.

In some cases, your complaint cannot be processed further and/or resolved without your consent to disclose your personal data to third parties outside the World Bank, as determined by the GRS. If you choose to provide your consent, your personal data will be shared with the third parties only to follow up on your complaint.

If you choose not to provide your consent, the GRS will continue to maintain confidentiality and follow up on your complaint to the extent possible while noting the corresponding limitations on the complaint-handling process, including the limited range of possible solutions and available options that can be offered towards case resolution.

Filing a complaint with the GRS and individuals from third parties simultaneously or forwarding to the GRS a complaint addressed to other third parties **authorizes** the World Bank to follow up on your complaint with such third parties. The GRS does not have any control over how third parties process your personal data. If you do not want the World Bank to follow up with these third parties, please do not copy them in the complaint you submit to the GRS.

INFORMATION WE COLLECT

Information You Provide to the World Bank

In order to respond to a complaint, the GRS initially collects and processes:

- The names and contact details of the individuals filing the complaint (the Complainants), and/or the names and contact details of their authorized representative;
- Information necessary to ascertain that the Complainants are people affected by a World Banksupported project; and
- Details about the alleged harm caused, or likely to be caused, by the World Bank-supported project.

Information We Collect from Third Parties

World Bank-supported projects are implemented by third parties in accordance with the World Bank's Operational Policies. To process your complaint, the World Bank may collect information about you from third parties involved in the implementation of the World Bank-supported project you are complaining about. In doing so, the World Bank will make best efforts to protect your personal data to the extent practical in the circumstances of your complaint.

TYPES OF PROCESSING

Your personal data is processed using manual and automated means.

HOW WE PROTECT YOUR INFORMATION

The GRS stores your personal data in its Case Management System, further restricting access to your data within the World Bank itself. Electronic copies of the documents may also be kept, including on cloud-based document storage systems. The World Bank maintains appropriate technical and organizational safeguards against unauthorized processing of your personal data and against accidental loss, destruction, or damage.

HOW LONG WE KEEP YOUR INFORMATION

Your personal data is typically retained for 6 years after the end of the fiscal year in which your complaint was received by the GRS, in accordance with the applicable World Bank Records Retention and Disposition Schedule (RRDS). The RRDS is subject to change without prior notice. The GRS may retain these records for a longer duration based on a legitimate business need (e.g., audit requirements or reporting purposes).

REQUEST AND REVIEW

In accordance with the World Bank Group Policy Personal Data Privacy and pursuant to Personal Data Privacy Request and Review Mechanisms, you may request information regarding the processing of your personal data, subject to reasonable limitations and conditions. To present a request for information please visit the <u>Data Privacy Request Mechanism page</u>.

Subject to such limitations and conditions, you may also seek review pursuant to Bank Directive Personal Data Privacy Request and Review Mechanisms if you reasonably believe that your personal data has been processed in violation of the World Bank Group Policy Personal Data Privacy. To initiate this process please visit the <u>Data Privacy Review Mechanism page</u>.

QUESTIONS OR CONCERNS

Please contact the Data Privacy Office at privacyquestions@worldbank.org.