

Somalia Data Protection Authority

Compliance Toolkit Template

INTERNAL DATA PROTECTION POLICY

Version: 1.0

Date of Issue: January 2026

Status: Mandatory

Issued under: Somalia Data Protection Act No. 005 (2023)

1. Purpose

This policy establishes the internal rules, responsibilities, and governance framework for processing personal data in compliance with the Somalia Data Protection Act No. 005 (2023).

The organization demonstrates compliance through documentation, training, internal audits, and periodic review.

2. Scope

This policy applies to all employees, contractors, consultants, and third parties processing personal data on behalf of [Organization Name].

3. Definitions

Personal Data: Any information relating to an identified or identifiable individual.

Processing: Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.

4. Roles and Responsibilities

- Management** is responsible for ensuring organizational compliance with this policy and applicable data protection law.

- **Employees and contractors** must process personal data lawfully, fairly, and securely.
- **Data Protection Officer (DPO)** – Where required under the Act, a Data Protection Officer shall be appointed. The DPO oversees compliance, provides guidance, monitors implementation, and liaises with the Somalia Data Protection Authority.

5. Lawful Processing

Personal data must only be processed where a valid lawful basis exists under the Act.

Processing must:

- Be limited to specific, explicit, and legitimate purposes
- Be adequate, relevant, and limited to what is necessary
- Be accurate and kept up to date
- Not be retained longer than necessary

6. Data Subject Rights

Employees must respect and support individuals' rights under the Act, including:

- Right of access
- Right to correction
- Right to deletion (where applicable)
- Right to object
- Right to lodge a complaint with the Somalia Data Protection Authority

7. Data Security

Appropriate technical and organizational measures must be implemented to protect personal data against unauthorized access, loss, alteration, or disclosure.

Such measures may include:

- Access controls
- Encryption
- Secure storage
- System monitoring
- Staff training

8. Data Sharing

Personal data may only be shared where:

- A lawful basis exists
- The purpose is clearly defined
- Appropriate agreements are in place
- Security safeguards are applied

9. Breach Reporting

All employees must immediately report suspected or actual personal data breaches to management or the DPO.

The organization shall assess and notify the Somalia Data Protection Authority where required under the Act.

10. Training and Awareness

Employees must receive regular data protection training to ensure awareness of legal obligations and internal procedures.

11. Policy Review

This policy shall be reviewed at least annually or following significant legal, organizational, or technological changes.

Approved by: _____

Date: _____

Signature: _____

Disclaimer

This template is provided by the Somalia Data Protection Authority for general guidance purposes. Organizations remain responsible for ensuring compliance with the Somalia Data Protection Act No. 005 (2023). Use of this template does not constitute approval or certification by the DPA.