LIBERIA MEDICINES & HEALTH PRODUCTS REGULATORY AUTHORITY

[LMHRA]

Data Privacy and Protection Policy

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1.0 PURPOSE

The purpose of this Data Privacy & Protection Policy is to ensure that all personal data collected, processed, stored, or transmitted by the Liberia Medicines and Health Products Regulatory Authority (LMHRA) is handled in accordance with the **Liberia Data Protection and Privacy Act**, international best practices, and LMHRA's regulatory mandate.
This policy establishes the principles, responsibilities, and controls required to safeguard personal data and protect the privacy rights of individuals.

2.0 SCOPE

This policy applies to:

- All LMHRA staff, contractors, consultants, interns, and partners
- All personal data processed by LMHRA in any form (digital or physical)
- All LMHRA systems, applications, databases, and cloud services
- All third-party service providers handling LMHRA personal data
- All regulatory processes involving personal information (e.g., licensing, inspections, HR, PV reporting)

3.0 POLICY STATEMENT

LMHRA is committed to protecting the privacy and rights of individuals by ensuring that personal data is collected, processed, stored, and shared lawfully, fairly, securely, and transparently. LMHRA will implement appropriate technical and organizational measures to prevent unauthorized access, misuse, disclosure, alteration, or loss of personal data.

4.0 LEGAL AND REGULATORY ALIGNMENT

This policy is aligned with:

- **Liberia Data Protection and Privacy Act**
- **ISO/IEC 27701 (Privacy Information Management)**
- **ISO/IEC 27001 (Information Security Management)**

- **WHO Digital Health & Regulatory Data Governance Guidelines**
- **COBIT 2019**
- **National ICT and cybersecurity regulations**

5.0 DEFINITIONS

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Sensitive Personal Data:** Includes health data, biometric data, financial data, and regulatory-sensitive information.
- **Data Subject:** The individual whose personal data is processed.
- **Processing:** Any operation performed on personal data (collection, storage, use, sharing, deletion).
- **Data Controller:** LMHRA, which determines the purpose and means of processing personal data.
- **Data Processor:** Any third party processing data on behalf of LMHRA.
- **Consent:** Freely given, informed, and explicit agreement by a data subject.

6.0 DATA PRIVACY PRINCIPLES

LMHRA adopts the following principles from the Liberia Data Protection Act:

6.1 LAWFULNESS, FAIRNESS, AND TRANSPARENCY

Personal data must be processed lawfully and transparently, with clear communication to data subjects.

6.2 PURPOSE LIMITATION

Data must be collected for specific, legitimate regulatory purposes and not used for unrelated activities.

6.3 DATA MINIMIZATION

Only the minimum necessary personal data should be collected.

6.4 ACCURACY

Data must be accurate, complete, and updated when necessary.

6.5 STORAGE LIMITATION
Personal data must not be retained longer than required for regulatory, legal, or operational purposes.

6.6 INTEGRITY AND CONFIDENTIALITY
Data must be protected against unauthorized access, alteration, or loss.

6.7 ACCOUNTABILITY
LMHRA must demonstrate compliance with privacy obligations.

7.0 CATEGORIES OF PERSONAL DATA PROCESSED BY LMHRA
- Staff employment records
- Licensing and registration data
- Pharmacovigilance reports (including patient information)
- Inspection and enforcement records
- Vendor and contractor information
- Visitor logs and access records
- ICT system logs containing user identifiers

8.0 LAWFUL BASIS FOR PROCESSING
LMHRA processes personal data based on:
- Regulatory mandate and legal obligation
- Public interest in public health protection
- Contractual requirements
- Consent (where required)
- Legitimate operational interests

9.0 DATA SUBJECT RIGHTS
Under the Liberia Data Protection Act, individuals have the right to:
- Access their personal data
- Request correction or deletion

- Withdraw consent (where applicable)
- Object to certain types of processing
- Request data portability
- Lodge complaints with the designated authority

LMHRA must respond to such requests within the legally required timeframe.

10.0 DATA COLLECTION AND USE

- Data must be collected directly from the data subject where possible.
- Data collected must be relevant and limited to regulatory needs.
- Privacy notices must be provided when collecting personal data.
- Sensitive data must be handled with enhanced protection measures.

11.0 DATA SHARING AND DISCLOSURE

Personal data may be shared only when:

- Required by law or regulatory mandate
- Necessary for public health protection
- Required for regulatory collaboration (MOH, NPHIL, Pharmacy Board)
- Covered by a data-sharing agreement
- The recipient meets LMHRA's security requirements

Unauthorized disclosure is strictly prohibited.

12.0 CROSS-BORDER DATA TRANSFER

Personal data may be transferred outside Liberia only when:

- Required for regulatory cooperation
- Adequate data protection safeguards are in place
- Approved by LMHRA Executive Management
- Compliant with the Liberia Data Protection Act

13.0 DATA SECURITY REQUIREMENTS

LMHRA must implement appropriate technical and organizational controls, including:

- Encryption of sensitive personal data
- Access control and authentication
- Secure storage and backup
- Network and endpoint protection
- Physical security for documents and servers
- Regular vulnerability assessments
- Secure disposal of personal data

14.0 DATA RETENTION AND DISPOSAL

- Retention periods must follow LMHRA's Records Management Policy.
- Personal data must be securely deleted or destroyed when no longer needed.
- Disposal of sensitive data must be documented and verified.

15.0 THIRD-PARTY PROCESSORS

Third parties handling LMHRA personal data must:

- Sign a Data Processing Agreement (DPA)
- Implement adequate security controls
- Process data only as instructed by LMHRA
- Notify LMHRA of any data breach immediately

16.0 DATA BREACH MANAGEMENT

LMHRA must:

- Maintain a Data Breach Response Procedure
- Investigate all suspected breaches immediately
- Notify affected individuals where required
- Report breaches to national authorities as mandated
- Document all incidents and corrective actions

17.0 PRIVACY IMPACT ASSESSMENTS (PIA)

A PIA must be conducted for:

- New systems or applications processing personal data
- High-risk processing activities
- Major changes to existing systems

18.0 ROLES AND RESPONSIBILITIES

Executive Director

- Provides oversight and approves the policy.

ICT Manager (Policy Owner)

- Ensures implementation of privacy and security controls.
- Maintains privacy documentation and breach logs.
- Coordinates PIAs and compliance audits.

Data Owners (Department Heads)

- Ensure lawful and compliant processing of personal data.
- Approve access and data-sharing requests.

All Staff

- Handle personal data responsibly.
- Report suspected breaches immediately.

Third-Party Processors

- Comply with LMHRA privacy requirements.
- Protect LMHRA personal data from unauthorized access.

19.0 MONITORING AND COMPLIANCE

- Regular internal audits must be conducted.
- Non-compliance must be reported to Executive Management.
- Corrective actions must be implemented promptly.

20.0 VIOLATIONS AND ENFORCEMENT

Non-compliance may result in:

- Disciplinary action
- Revocation of access privileges
- Contract termination (for vendors)
- Legal penalties under the Liberia Data Protection Act

21.0 POLICY REVIEW

This policy must be reviewed:

- After three years
- After major incidents
- After changes in legislation or regulatory requirements

The ICT Manager is responsible for initiating the review.

22.0 APPROVAL

This policy becomes effective upon approval by the Executive Director of LMHRA.

The *Data Privacy and Protection Policy is Hereby Promulgated and Approved by the Managing Director on this 13th Day of April A. D. 2026.*

Hon. Luke L Bawo
Managing Director / LMHRA