Boafo Nsa
CIVIL WORKS · GHANA

BN-POL-15
VERSION 1.0

CORPORATE POLICY

Data Protection and Confidentiality Policy

EFFECTIVE DATE	VERSION	NEXT REVIEW
11 August 2026	1.0	12 months after approval

POLICY OWNER	APPROVED BY
Managing Director (operated by the Data Protection Supervisor)	Board of Directors, [date]

APPLIES TO
All personnel and third parties handling Boafo Nsa, client or personal information

01 Policy statement

Boafo Nsa holds personal data on hundreds of workers, as well as confidential client drawings, tender prices and site security details. We collect only what we need, keep it secure, and use it only for the purpose it was collected for, in line with the Data Protection Act, 2012 (Act 843).

02 Registration

Boafo Nsa registers as a data controller with the Data Protection Commission and renews registration as required.

03 Personal data we hold

DATA	PURPOSE	TYPICAL RETENTION
Worker ID (Ghana Card), contact details, next of kin	Hiring, age checks, emergencies	Employment plus [6] years
Bank and mobile money details, SSNIT number, pay records	Wages and statutory payments	[7] years
Medical fitness and injury records	Fitness for duty, compensation claims	[Per legal advice]

DATA	PURPOSE	TYPICAL RETENTION
Training and competence records	Proving competence to clients and authorities	Employment plus [6] years
Grievance, whistleblowing and SEAH case files	Investigation and response	[Per legal advice], strictly restricted
Site CCTV and access logs	Security and incident investigation	[30] days unless needed for an incident
Community contact details	Stakeholder engagement and grievances	Project duration plus [3] years

04 Principles

01 Collect personal data lawfully and tell people why it is collected

02 Collect only what is needed; do not photocopy ID cards unless required

03 Keep data accurate and up to date

04 Restrict access to those who need it; health and SEAH records are held separately with tighter access

05 Keep data secure: locked cabinets on site, password-protected devices, two-factor authentication on email and cloud accounts

06 Keep data only as long as needed, then destroy it securely

07 Respect the rights of individuals to see, correct or object to the use of their data

05 Confidential business information

Tender prices, client drawings, security arrangements for sites and cash, and commercial terms are confidential. They are shared only with those who need them, never posted on social media, and not taken when a person leaves the company. Photos of client sites are posted publicly only with the client's approval.

06 Transfers

Personal data is shared with clients, lenders, insurers or service providers only where necessary and under a written agreement. Transfers outside Ghana, for example to cloud services or partners abroad, are made only with adequate safeguards.

07 Breaches

Loss or theft of devices, files or data, or any unauthorised access, must be reported to the Data Protection Supervisor immediately. Serious breaches are notified to the Data Protection Commission and affected people as the law requires.

08 Requests and contact

People can ask to see or correct their data by writing to [privacy@boafonsa.com]. Requests are answered within the time set by law.

09 Review

The Data Protection Supervisor reports annually to the Board on registration, requests and breaches. This policy is reviewed at least every 12 months.

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