

**Annex 1: Engagement context — Key information for a pillar assessment**

<b>ENTITY SUBJECT TO ASSESSMENT</b>	<b>Caribbean Export Development Agency</b>
<b>PILLAR</b>	<b>PILLAR SUBJECT TO ASSESSMENT (1)</b>
<b>1 INTERNAL CONTROL</b>	<b>Completed</b>
<b>2 ACCOUNTING</b>	<b>Completed</b>
<b>3 EXTERNAL AUDIT</b>	<b>Completed</b>
<b>4 GRANTS</b>	<b>Completed</b>
<b>5 PROCUREMENT</b>	<b>Completed</b>
<b>6 FINANCIAL INSTRUMENTS<sup>1</sup></b>	<b>N/A</b>
<b>7 EXCLUSION FROM ACCESS TO FUNDING</b>	<b>YES</b>
<b>8. PUBLICATION OF INFORMATION ON RECIPIENTS</b>	<b>YES</b>
<b>9. PROTECTION OF PERSONAL DATA</b>	<b>YES</b>

*(1) The entity should state here YES or NO to indicate whether the pillar is subject to assessment.*

***Pillars 1, 2, 3, 7, 8 and 9 are always subject to assessment<sup>2</sup>.***

***Pillars 4 to 6 may be subject to assessment, depending on the nature of the budget implementation tasks to be entrusted.***

<sup>1</sup> The reference to ‘financial instruments’ is deemed to also include budgetary guarantees.

<sup>2</sup> In the exceptional case that neither the rules and procedures for grants, nor for procurement nor for financial instruments are assessed (i.e. none of the pillars 4 to 6), there is no need to assess the rules and procedures for exclusion and publication (i.e. pillars 7 and 8).

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## PILLAR 7 — EXCLUSION FROM ACCESS TO FUNDING

### 1. Legal and Regulatory Framework

Caribbean Export provides grant funding to the private sector via the Direct Assistance Grant Scheme (DAGS) and Direct Support Grants Programme (DSGP). The objectives of the DSGP are as follows:

- To provide direct support to the CARIFORUM private sector including small and medium-sized enterprises (SMEs) on a non-reimbursable basis, given the challenges being experienced as a result of the COVID-19 pandemic;
- To provide support to facilitate activities focusing on business continuity;
- To facilitate the increase of exports within the Caribbean and/or international markets; and
- To capitalise on the benefits of the CARIFORUM-European Union Economic Partnership Agreement (EPA), CARICOM Single Market Economy (CSME), the Free Trade Agreement between CARICOM and the Dominican Republic or any other bilateral or multilateral arrangements signed by the countries of the region within the region or with ACP or European Union (EU) partners.

The Agency has been administering this grant programme under the 11<sup>th</sup> EDF Regional Private Sector Programme since 2008. There were two Calls for Proposals for the DAGS made in 2018 and 2019. In response to the COVID-19 pandemic, the Agency with funding from the EU developed the DSGP a non-reimbursable grant valued between €5,000 - €15,000, which is provided for CARIFORUM firms to implement approved projects. The first call for the DSGP was launched in August 2020. The 2<sup>nd</sup> call was launched on October 22<sup>nd</sup>, 2021. The Agency also collaborated with the Caribbean Development Bank to launch the Technical Assistance Programme (TAP) on May 31, 2021. The TAP will provide 100% coverage of eligible costs or a maximum of USD15, 000.00 per grant. A special call was also launched for firms from the Dominican Republic, under the TAP programme.

The Agency has outlined a legal and regulatory framework to govern the administering of this grant programme including the application, disbursement and reporting processes. This framework was adopted for previous grant programmes and has been continuously updated to be as robust as possible and adhere to donor and legal requirements. The following documents currently outline the legal and regulatory framework as it pertains to grant funding:

- Guidelines & Procedures for The Direct Support Grants Programme
- Annex II - General Conditions Applicable to The Direct Support Grants Programme General and Administrative Provisions
- Annex IV - Procurement & Disbursement Procedures for Direct Support Grants Programme

- Annex V - Request for Disbursement
- Annex VI Narrative Report
- Annex VII Financial Report

The Agency's exclusion criteria is noted specifically in Article 4 of ANNEX II - General Conditions Applicable to the Direct Support Grants Programme General and Administrative Provisions.

Regarding awarding of contracts for services and tangibles, the Agency's legal and regulatory framework is noted in Section 2.2.2 "Basic Rules for Services and Tangible Items Contracts" The established criteria are applied universally to all grant and tendering candidates. Furthermore, remedial measures and right to defence measures are included.

## 2. Exclusion Criteria

The Agency outlines the exclusion criteria under Article 4 of the ANNEX II - General Conditions Applicable to the Direct Support Grants Programme General and Administrative Provisions, which states:

### ARTICLE 4 | EXCLUSION FROM FUNDING

- 4.1. Any potential beneficiary for the Direct Support Grant Programme will be excluded from receiving funds if he/she has breached the application declaration and found to have:
  - Declared bankruptcy, insolvency, or is in the process of winding up the business.
  - Breached payment of taxes/social security contributions.
  - Been convicted of professional misconduct/misrepresentation, fraud, corruption, being part of a criminal enterprise, money laundering, terrorist offences/activities, the use of child labour or human trafficking in the production of goods and services, or any other irregularity.
  - Established the business as a shell company
- 4.2. If any business is found to have engaged in any of the actions stated in Article 4.1, they shall be barred from applying from future grants programme.
- 4.3. Shall any person be of the view that their business has been wrongly classified in the categories, under Article 4.1, they can write to the Manager – Competiveness and Export Promotion at [dsgpinfo@carib-export.com](mailto:dsgpinfo@carib-export.com) and provide information to justify their non-exclusion. This must be done within 5 working days of Caribbean Export's notification.

Additionally, under the section entitled “Basic Rules for Services and Tangible Items Contracts” of the Operations Manual, the criteria for exclusion of funding is clearly listed and details that candidates (services or tangibles) or tenderers will be excluded from participation in a procurement procedure if they are:

- a. are bankrupt or being wound up, are having their affairs administered by the courts, have entered into an arrangement with creditors, have suspended business activities or are in any analogous situation arising from a similar procedure provided for in national legislation or regulations;
- b. are the subject of proceedings for a declaration of bankruptcy, for winding-up, for administration by the courts, for an arrangement with creditors or for any similar procedure provided for in national legislation or regulations;
- c. have been convicted of an offence concerning professional conduct, fraud, corruption, money laundering, terrorist offences/activities, the use of child labour or human trafficking in the production of goods and services by a judgement which has the force of *res judicata*
- d. are guilty of grave professional misconduct proven by any means which Caribbean Export can justify;
- e. have not fulfilled obligations relating to the payment of taxes in accordance with the legal provisions of the country where they are established;
- f. are guilty of serious misrepresentation in supplying the information required by the contracting authorities as a condition of participation in an invitation to tender or contract; they have been declared to be in serious breach of contract for failure to comply with obligations in connection with another contract with the same Contracting Authority or another contract financed with Caribbean Export’s funds;
- g. are in one of the situations allowing exclusion referred to in point 2.3.7 in connection with the tender or contract.
- h. convicted of any other irregularity.
- i. created as or operating as a shell company.

### **3. Procedures.**

For grant funding, all applicants need to sign an applicant's declaration listing that they meet the requirements set out in the exclusion clause.

#### **Applicants' Declaration**

I hereby apply for a Direct Support Grant to meet part of the cost of undertaking activities to improve our competitiveness. I hereby declare that:

1. I am part of a private enterprise, registered in a CARIFORUM country and majority owned by private interests;
2. The project for which I am applying for a Direct Support Grant can be reasonably expected to produce measurable benefits to my/our company, well in excess of total consulting fees and expenses;
3. If recommended to be awarded a grant, I accept the contractual obligations as laid down in the grant contract;
4. I have not declared bankruptcy, insolvency, or is in the process of winding up my business. I am not in breach of payment of taxes/social security contributions. I have not been convicted of professional misconduct/misrepresentation, fraud, corruption, being part of a criminal enterprise, money laundering, terrorist offences/activities, the use of child labour or human trafficking in the production of our goods and services, or any other irregularity. I have not established my business as a shell company.
5. I conform with national health, labour, safety and environmental requirements;
6. I agree to provide access to Caribbean Export and/or a partnering Business Support Organisation in the applicant's country of domicile to verify the accuracy of the application and proposal and/or legitimacy of the business. It is understood that if any application is deemed to contain inaccurate/misleading information it will be rejected, and the company will not be eligible to re-apply to the programme for a period of five (5) years;
7. I will allow Caribbean Export and any European Union-appointed auditor to have access to and sight of all areas and records of our operations relating to the proposed project for a period of up to three years after project completion;
8. I accept that Caribbean Export, the European Union and the African, Caribbean and Pacific Group of States will bear no responsibility for the project. The information and statements contained in the accompanying Application for a Direct Support Grant are true, fair and accurate to the best of my knowledge and it is understood that Caribbean Export may withhold disbursement of the support in the event of misrepresentation of any facts stated in this Application or in any subsequent requests by myself for the payment of a Direct Support Grant;
9. I agree to abide by the decisions of Caribbean Export regarding the award or disbursement of any Direct Support Grant requested by me.
10. I understand that Caribbean Export shall hold in confidence all information contained in this Application and shall not at any time make any public disclosure regarding

my/our enterprise, my/our activities or the project under application without our prior written consent. This Application is made with the full knowledge and acceptance of our Directors/Proprietors.

### **Services and Tangibles Procurement Declaration**

For procurement contracts (services and tangibles), all TORs include a declaration clause as well, which indicates that companies submitting proposals for evaluation to the Agency declare that they are not in violation of the company's conditions for exclusion from funding.

### **Early Detection and Exclusion System**

The Agency has created an Early Detection and Exclusion System which is used to evaluate companies who are undergoing the Agency's procurement process for contractual thresholds between BBD\$25,000.00 and up to a maximum of BBD\$250,000.00 for services, and between BBD\$25,000.00 and up to a maximum of BBD\$100,000.00 for tangibles.

The system mentioned above, identifies and hosts information on restrictive parties with the sole interest of protecting the financial and legal interest of Caribbean Export and its donor partners. The Early Detection and Exclusion System details the process of restriction, provides tools used to analyse clients, identifies the parameters surrounding exclusion of funding, the duration of prohibition, review and update cycles, and remedial measures which can be taken.

The tools included in the Early Detection and Exclusion System are:

- The Blacklist Report
- International Credit Review Agency (Refinitiv via Thomson Reuters)

### **Tools in the Early Detection and Exclusion System**

#### **1. The Blacklist Report**

Caribbean Export, through the blacklist report, ensures that persons conducting business with the Agency are not in violation of the conditions under which grounds for exclusion can be determined based on the Agency's exclusion criteria.

### **Framework of Blacklist Report**

The following criteria is considered when determining whether a firm/company/individual is identified and placed on the blacklist. The blacklist must be consulted by all staff to ensure that any contractor/company under evaluation is not in violation with the Agency's exclusion criteria listed as mentioned in "Basic Rules for Services and Tangible Items Contracts" of the Operations Manual.

## 2. International Credit Review Agency (Refinitiv via Thomson Reuters)

Refinitiv is one of the largest providers of financial market data, analytics and tools which assist businesses in making decisions. Supported by information from Thomson Reuters, these tools allow Caribbean Export to conduct due diligence checks on clients, third-party contractors, and grant beneficiaries based upon areas defined in the Agency's exclusion criteria.

### Procedures - Early Detection and Exclusion System

For evaluation of companies who are undergoing the Agency's procurement process, the Early Detection and Exclusion System must be consulted. Bids that are BBD\$25,000.00 and above but below BBD\$250,000.00 for service contracts and between BBD\$25,000.00 and BBD\$100,000.00 for tangible contracts are evaluated through this system.

Tenders Bids are evaluated using the Open Tender Procedures.

All staff of the Agency when engaging in the procurement of goods, services or issuing a call for proposals of grant funding must consult the database and utilise the below levels of risk indication in succession to determine appropriate action to be taken.

Risk Level	Indicator	Assessment Steps	Action
1	Low	<p>Review Blacklist Report to identify any prohibition.</p> <p>Review company's website profile and identify correlations with official documents submitted. Eg company name, address, contact details, registration, nature of business.</p>	<p>1A. If the company is identified on the Blacklist they will be excluded from any form of access to funding</p> <p>1B. If the company is not listed on the Blacklist but the Agency has identified cause for doubt or concern such as:</p> <ul style="list-style-type: none"> <li>Inconsistencies with information submitted compared to that listed on the company's official website</li> </ul>



			<ul style="list-style-type: none"> <li>• The company does not have an official website</li> <li>• Information gathered from business research which indicates possible inappropriate conduct</li> </ul>
Then the assessment should be elevated to <b>Level 2</b>			
2	Moderate	Consult with regional partners such as Business Support Organisations (BSOs), Chambers of Commerce, Coalitions of Services Industries (CSIs) for due diligence checks at the local level in the respective countries of the client/contractor.	In addition to Level 1B findings, if the due diligence checks via regional partners identify further inappropriate conduct and or findings indicate that grounds for exclusion exist within the context of the Agency' exclusion criteria.
Then the assessment should be elevated to the highest level, <b>Level 3</b>			
3	High	Conduct due diligence checks via international credit review Agency (Refinitiv via Thomson Reuters)	Once the assessment has reached this level, international due diligence checks are initiated by the Agency through the international credit review Agency Refinitiv via Thomson Reuters.  If the results of this international assessment is negative or indicate grounds for exclusion exist

			within the context of the Agency' exclusion criteria
<b>The company will be excluded from funding.</b>			

**Right to Defence-Review and Update Cycle**

The blacklist is reviewed and updated on a quarterly basis. Companies on the blacklist can lodge a request for review of their status in writing, supported by evidence, to the Executive Director of the Agency. All information provided and gathered by the Agency, its partners (BSO's, Chamber of commerce and CSI's) and international third-party due diligence agencies will inform the review and update of the status of the companies identified on the blacklist.

**Remedial Measures-Corrective Action**

Companies/contractors appearing on the blacklist must provide legitimate proof of corrective action for assessment and consideration for removal from the list. The Agency's leadership team, in conjunction with its lawyers, will conduct an assessment of evidence provided and report the results of the decision within five (5) days of the request for review.

## PILLAR 8 — PUBLICATION OF INFORMATION ON RECIPIENTS

### 1. The legal and regulatory framework

Under Article 6 – “Visibility” of the Grants Annex II – General Conditions, the grant beneficiary authorises Caribbean Export and the European Union to publish the Beneficiary’s name and address, the purpose of the grant, the maximum amount of the grant and rate of funding of the Project's eligible costs, as laid down in Article 3.2 of the Special Conditions. Derogation from publication of this information may be granted if it could endanger the Beneficiary or harm his commercial interests.

The Agency’s current publication processes are in alignment with the *International Aid Transparency Initiative* (IATI) standard for disbursements of funds and results data on the impact or outcome of the activity. Caribbean Export uses procedures for the publication of all communication modalities that comply with the *Communication and Visibility in EU financed external actions: Requirement for implementing partners (Projects)* [communication-visibility-requirements-2018\\_en.pdf \(europa.eu\)](#) and with the IATI standard: <https://iatistandard.org/en/about/iati-standard/>

### 2. Requirements for publication.

Caribbean Export Development Agency regularly publishes general content to its website and social media platforms, according to the editorial calendar. The content includes informational articles, press releases and success stories highlighting beneficiaries of the Agency's programmes and initiatives. Information is published to the website at least once weekly. Terms of reference are also published on the website on an ad-hoc basis.

Caribbean Export publishes information on grant awardees on its [website](#) for promotional and visibility purposes. The information received from the Grants implementation team highlights sectors approved to receive funding, the company name, country, purpose and award amount. This information is published after the Agency’s grants team has completed the evaluation process. Under Article 6 of the general conditions of the Grants programme, firms authorise Caribbean Export to publicise specific information. This Article also makes provision for an exemption, if sharing sensitive information places the beneficiary at risk. The grant beneficiary information is also repurposed to create multiple content types including success stories, videos, case studies and print materials. Each content type uses different information to appeal to the various target audiences.

For example, the Agency published its *Implementation Report 2017-2020 on the 11<sup>th</sup> EDF RPSDP* in 2021 in both hardcopy and on its website. The publication provides general information on programmes and projects, including the Direct Assistance Grants Scheme (DAGS), where the number of grants is aggregated by country. In the publication, there is data

that also identifies the allocation of grants by sector and narrative that informs the general purpose of the projects.

The Agency also publishes individual country briefs which are done on an ad hoc or as required basis, offering more specific information on benefits derived for each CARIFORUM state, including that for grant recipients. In these briefs, names and locality are specified, but the DAGS grant amounts are provided in aggregated figures for the total number of recipients from each beneficiary country, unless there is one recipient from a country awarded. In this case, the name of the firm, locality and amount awarded would be individualised in the brief. In some cases, information (names, locality and grant/funding amounts) on individual recipients who have benefitted from grant/funding programmes facilitated by non-EU donor partners are also highlighted in the country briefs.

For the DAGS impact assessment exercise that was conducted in 2020, Caribbean Export informed firms on the use of the information obtained during interviews. Firms were informed that information obtained is for reporting purposes and may be published. The standard practice is to request permission from firms to share or disclose information as it pertains to outcomes and impact of DAGS projects in reports, publications, and on the Agency's website. This was also the standard procedure for all success stories that have been published. In addition, the Agency periodically shares awardee [case studies](#) with donor partners, stakeholders and the public to showcase the use of funds and the impact or outcome of the activity/programme.

### **Publication of Award of Procurement Contracts**

The publication of award of procurement contracts is established in the Operations Manual for contract values between BBD\$25,000.00 and BDS\$250,000.00 (services) and between BBD\$25,000.00 and BBD\$100,000.00 (tangibles).

Contract values for BBD\$250,000.00 and over are governed by the Open Tender Procedures.

Information regarding the award of the contracts is captured within the Agency's Contract Register. This register details the following information:

- The name of the awardee
- Contract scope
- Amount and currency of contract
- Jurisdiction of awardee
- Date of the award of the contract

Information captured in the contract register is posted/updated on a monthly basis on the Agency's website.

All contracts include a declaration clause which indicates the Agency has the right to publish information regarding the award of the contract on its official website.

### **Exceptions - Conditions for waiver**

In circumstances where the publication of information on the Agency's website can be perceived to threaten the rights and freedoms of individuals, harm their commercial interest or jeopardise confidentiality and security, the Agency will notify the awardee and consider a waiver of the publication clause and procedures.

## PILLAR 9 — PROTECTION OF PERSONAL DATA

### 1. The legal and regulatory framework

The Barbados Data Protection Act 2019, governs the Agency's Policy for the protection of personal data as it relates to the head office in Barbados. The Dominican Republic's Law No. 172-13 for the Protection of Personal Data (in Spanish) (PDP Law) is the country's comprehensive data protection law which governs the Caribbean Export's sub-regional office in the Dominican Republic. These laws inter alia govern the collection, storage, safekeeping, use, and access rights of personal data recorded in files, databases, and registries for issuing public or private reports and to protect the privacy of individuals in relation to their personal data. Caribbean Export's legal and regulatory framework is detailed in the Agreement Establishing the Agency and the applicable laws under which any disputes relating to the office operations are settled vis-a-vis the Laws of Barbados for the headquarters office and the Dominican Republic for the sub-regional office.

Caribbean Export's Personal Data Protection (PDP) Policy provides the legal framework for the protection of personal data. The Policy sets out the rules and principles governing the collection, maintenance, processing, use, and dissemination of personal data, by the Agency. The purpose of the Policy is to ensure that Caribbean Export processes personal data in a way that is consistent with recognized international standards for the processing of personal data.

The PDP Policy applies to all stakeholders who interact directly with Caribbean Export, including staff members, board of directors, consultants/contractors, interns, beneficiaries, suppliers, counterparts, and strategic partners, among others, in all CARIFORUM States and worldwide, with whom the Agency collaborates to fulfill its mission.

The Agency's website Privacy Policy outlines the types of information that Caribbean Export collects from individuals who visit the website or respond to the Agency's online advertisements. The Policy also outlines the way in which the Agency may use the information. Further, the website Terms of Use clearly articulates the terms of conditions under which users may use the website.

In addition, Caribbean Export's grant procedures provide applicants and beneficiaries of grants with specific guidance on the rights of the data subjects, how their information is collected and processed, and for what purpose it will be used.

## **2. Requirements for the protection of personal data.**

Caribbean Export's PDP Policy outlines the seven fundamental principles related to the processing of personal data namely:

1. Legitimate, fair and transparent processing;
2. Purpose limitation;
3. Data minimisation;
4. Data accuracy;
5. Storage limitation;
6. Security and
7. Accountability

The personal data is collected through interviews, questionnaires, subscriptions, registration forms, surveys, agreements, website, evaluation and assessment forms. The personal data is collected from the Data Subjects who attend virtual and in-person project activities, including training workshops, webinars, meetings, trade missions, trade fairs and forums. Personal data is also collected from access to finance applicants, through call for proposals and beneficiaries of funding/grants. Some of these forms provide data subjects with the assurance that the personal data collected will be kept in "strictest of confidence." Data collection documents inform data subjects that "feedback will remain anonymous and will only be used for reporting purposes," this allows the Agency to use relevant data to conduct impact analysis and illustrate results.

In the Annex II of the General Conditions of the Grant procedures – Article 5 – Confidentiality, it states that Caribbean Export and the Beneficiary undertake to preserve the confidentiality of any document, information or other material communicated to them in confidence until at least seven (7) years after the final payment.

### Legitimate, Fair and Transparent Processing

When data is collected from Data Subjects, Caribbean Export ensures that if and when the personal data is processed, that it is done so lawfully, fairly and transparently. The legal bases for which Caribbean Export processes personal data are through consent and contract. Consent of data subjects is required when processing data. This consent is requested formally and informally. Data subjects are asked to consent to the processing of data from questionnaires, assessments, testimonials, and case studies and other instruments. The Agency operates in a transparent and honest manner. Individuals are always provided with information on the Agency's use and dissemination of that information. For example, the recipients of funds consent to their data being processed for monitoring and evaluation and public relations purposes.

Caribbean Export also ensures that unsolicited emails are not sent to website subscribers. Subscribers are required to indicate by ticking a checked box on the subscription form to select specific communication.

### Purpose Limitation

Personal data is collected for specified, explicit and legitimate purposes, namely for the participation in and evaluation of projects/activities implemented by Caribbean Export and is not further processed in a manner not compatible with those purposes. The processing of information is usually limited to monitoring and evaluation reporting and promotional purposes.

### Data Minimisation

Personal data that is collected and processed is adequate, relevant, and limited for the relevant activities and projects. For example, a ticket booking for a participants to attend a mission will require full name, date of birth, and contact information to complete the booking process. Caribbean Export is also provided with copies of the data subject's government issued documents (passports, pages of biometrics, certification of incorporation).

### Data Accuracy

In most cases, the personal data collection instruments are completed by the data subject. However, in some cases when assessments and evaluations are coordinated, the data collection instruments are completed by both the data subjects and Caribbean Export staff. Audio and video recording instruments are utilized in these instances, thus ensuring accuracy of data collected. Personal data is also received and or researched for the Agency's various portals and websites including, Absolutely Caribbean, CE Intelligence Portal and Services Registry. To ensure the accuracy of the data on the Agency's platforms, consistent review and follow-up is done as necessary for completeness.

### Storage Limitation

Personal data is kept as necessary and in accordance with our Records and Information Management (RIM) Policy. The purpose of the RIM Policy is to provide general guidelines on the roles and responsibilities of Caribbean Export staff for the proper establishment and maintenance of a RIM programme at the Agency. Along with the RIM Policy, the Record Retention and Disposition Policy (RRDP) provides guidance on the retention and disposal of the Caribbean Export's electronic and paper records and documents. The purpose of this RRDP is to ensure that the necessary records and documents of Caribbean Export, in any format, are adequately protected and maintained. The Policy also includes information on



the disposal of records that are no longer needed by Caribbean Export or are of no value, that these are disposed at the proper time in compliance with all applicable legal statutes and regulations. Most of the personal data is collected and kept in either excel databases and other instruments including electronic (for example: SurveyMonkey and Go-To-Meeting) and physical surveys and evaluation forms.

## Security

Caribbean Export information technology systems provide appropriate technical and organisational data security measures against unauthorised or unlawful processing, accidental loss, destruction, or damage of personal data specifically, for Caribbean Export's employees and clients. Within Caribbean Export's General Information Security Policy there are specific sections that clearly outline the Agency's policies regarding the use of certain applications by staff for security purposes. It is worthwhile to note that the Agency's IT personnel are certified and equipped to launch counter measures to protect against security frauds and other types of irregularities involving the use of information system and ensure the security of personal data.

The IT infrastructure also provides an additional layer of security regarding access control to information as a whole and restricted access to sensitive information. Staff are provided with passwords as part of the access control mechanisms which is an integral component of IT and data security for Caribbean Export. The Operations Manual provides guidance on data security, namely user-access to the Agency's technology tools is by password only. The passwords are changed every month.

The Operations Manual provides guidelines for the 'Security of Records' namely hard copy records under the Records and Information Section of the RIM procedures. The following security precautions must be in place at all times:

The entrance to the Registry (or any other place where files are stored) is strictly controlled. Cabinets containing confidential records must be kept locked. The outer door to the Registry is always locked when members who manage record offices/registries are not on site. Keys are stored in a secure place and only accessed by persons who manage the records/registries sites.

Hard-copy grant proposals, including DAGS, DSGP and TAP calls for proposals are registered and stored in a secure area. Active and vital records which include applicant/beneficiary register, evaluation committee reports, beneficiary applications, beneficiary grant contracts and other supporting documentation are identified and housed securely. Completed grant files or documents are archived in the General Registry.

## Accountability

Caribbean Export PDP Policy ensures the Agency is accountable for the protection of individual's personal data. The Agency also implements appropriate security and organisational measures to protect personal data and is compliant with the General Information Security Policy.

To ensure accountability for the Processing of Personal Data in keeping with this Policy, Caribbean Export shall adopt appropriate procedures to ensure compliance with this Policy; and provide Data Subjects with a method, subject to reasonable limitations and conditions, to request information regarding the Data Subject's Personal Data being Processed by Caribbean Export; and to seek redress if the Data Subject reasonably believes that the Data Subject's Personal Data has been Processed in contravention of this Policy.

## Rights of Data Subjects

Caribbean Export's Personal Data Protection Policy and Procedures Manual provides general guidelines on the rights of Data Subjects:

1. To information;
2. Access and rectify or erase personal data;
3. Data portability and
4. Confidentiality of electronic communications.

## Right to information

Caribbean Export publishes its Calls for Proposals for grant funding on its website ([www.carib-export.com](http://www.carib-export.com)), in the press and in other print media. Successful grant applicants are provided with official correspondence, namely a cover letter confirming the award and a grant contract and details pertaining to the project implementation.

The grant contract specifies the beneficiary, start, duration, maximum amount of funding, title of the action, activities to be implemented, grant procedures, budget, procurement procedures, payment request, narrative and financial reports to make a reimbursement claim. The grant contract Annexes II & IV both specify eligible costs, procurement rules and means of verifying actual costs incurred by the beneficiary.

Beneficiaries are encouraged to contact Caribbean Export's grants team for guidance on the terms and conditions of the grant contract and on implementation of the respective project activities.

Unsuccessful applicants are notified in writing of the reasons why their applications were declined. Applicants are also encouraged to request the scores from their application results to improve their chance of being successful in future Calls for Proposals.

In addition, website users are occasionally requested to provide additional information which may be gathered by use of a “cookie” or similar file. The data subject’s agreement to and provision of information is completely voluntary.

#### Right to access and rectify or erase personal data

As stated earlier, Caribbean Export’s website Privacy Policy outlines the types of information the Agency collects from individuals who visit the website or respond to the Agency’s online advertisements.

Article 8 – Evaluation/Monitoring of The Action - 8.1 in the Grant Procedures states that if Caribbean Export (or the European Union where it is not Caribbean Export) carries out an interim or ex post evaluation or a monitoring mission, the Beneficiary shall undertake to provide it and/or the persons authorised by it with any document or information which will assist with the evaluation or monitoring mission and grant them the access rights described in Article 16.2 which speaks to Accounts and Technical and Financial Checks.

The Agency’s website Privacy Policy also states that if the Data Subject has submitted personal information through the Caribbean Export’s website or online advertisement and requests that their personal data is deleted, the Agency will oblige to meet their request.

#### Right to confidentiality of electronic communications

Data Subjects have the right to request that their personnel data is transferred to a third party via electronic communications. Caribbean Export’s utilises its CE Diagnostic Tool to assess firm’s strengths and weaknesses as a criteria for selecting firms to participate in projects and activities. If users want their personal data generated in reports to be shared with third parties, they must make that request in writing to the Agency. The data is transmitted via the tool.

