## Purpose

Our Data Protection Policy refers to our commitment to treat information of members, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

#### Scope

This policy refers to all parties (members, suppliers etc.) who provide any amount of information to us.

## Who is covered under the Data Protection Policy?

Directors, Members andVolunteers of GADOC must follow this policy. Contractors, consultants, partners and any other external entity with access to our data are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data. We have in place a data map to identify all parties who we believe have access to our data in any way.

#### **Policy elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc. Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply:

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by us within its legal and moral boundaries
- Protected against any unauthorised or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organisations, states or countries that do not have adequate data protection
- policies unless equivalent provisions have been put into place (ie a specific and enforceable contract protecting the data transferred)
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data GADOC has direct obligations towards people to whom the data belongs. Specifically we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their Information

- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

# Actions

To exercise data protection we are committed to:

- Restricting and monitoring access to sensitive data
- Developing transparent data collection procedures
- Training directors, in online privacy and security measures
- Building secure networks to protect online data from cyberattacks
- Establishing clear procedures for reporting privacy breaches or data misuse
- Including contract clauses or communicating statements on how we handle data
- Establishing data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)
- Providing access to our data protection provisions through the Privacy Notice on our website.

## **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.