Service Civil International
Volunteering for peace

NGO Official partner of UNESCO (Consultative status)   Participatory status with the Council of Europe

Data Audit and Compliance Plan (DACP)

The Association of Service Civil International ivzw

Last updated	22 August 2024

Introduction

From May 25 2018, the new General Data Protection Regulation (GDPR)[1] came into effect. This regulation is legally binding and covers all personal data[2] in the European Union. This includes any personal data that is shared or used by European entities and the sharing of data from European citizens with organizations based in countries outside the EU. By this time all organizations who collect or process personal data will have to ensure they are fully compliant with the law.

The following document outlines three things:

- A data audit for all the data The Association of Service Civil International ivzw (a.k.a. SCI IS) is the controller[3] of and which data SCI is the processor of.

- A compliance plan, outlining how SCI IS will ensure it is compliant with the GDP Regulations. This compliance plan will include reference to our Privacy Policy as well as privacy notices for the different platforms through which the International Secretariat of SCI collects, stores and shares data.

- A Data Protection Policy will be available for public consultation exactly outlining for the public what SCI IS does with the data it collects. This protection policy will cover all the streams of data SCI IS has: externally funded projects, the Online Placement System, the Online Evaluation system, Online Learning Platform, the communication platforms (newsletters, social media groups and mailing lists), insurance information and all other current or future streams of data.

Data Audit

This first section covers all the different ways data is collected, stored and shared by SCI IS. It will focus on factually stating the different streams of data SCI IS has and any data which is distributed to third parties. SCI IS is not responsible for the data collected and held by its branches, groups and partners.

There are several streams through which SCI IS collects data:
- Externally funded projects and activity organisation
- Online Placement System (OPS)
- Online Evaluation System (OES)

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[1] Regulation (EU) 2016/679 (General Data Protection Regulation) - https://gdpr-info.eu

[2] Personal data refers to any information relating to an identified or identifiable natural person.

[3] Controller – "*means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data*"

- Online Learning Platform
- Application records
- Communication platforms
- Insurance information

Each stream collects and stores data in a different way, which is why they will be handled separately. The Compliance plan will then outline the safety regulations for the different streams.

Externally funded projects

Data collected for externally funded projects depends on what is necessary for the external donors and what information is necessary in order to run the project events successfully. This includes personal data as deemed relevant to the project, such as but not limited to: full names, DOB, ID/passport numbers, contact information, bank account numbers, CV's and signatures.

This data is collected through application forms, email communications, attendance lists, travel reimbursement forms and information that has been shared with SCI IS from other organizations (branches, partners or other institutions such as the European institutions). Outside of reporting platforms used by different external funders, SCI IS uses the Google Cloud Suite[4] and Microsoft 365[5] in order to manage their projects, including sharing of information through GSheets, Microsoft Office Tools and processing of applications through GForms and Microsoft Forms .

The data is used in three different capacities:

- To process the information of applicants for different events where this information is needed for logistical arrangements and reporting to external funders;
- To communicate with the applicants to the event all the necessary information, including preparation information, evaluation forms, peer communication, and follow-up work after the events such as results dissemination and travel reimbursements;
- To store information from applicants for future projects, events or initiatives that we feel they might be interested in with their permission.

Online Placement System (OPS)

The OPS is an online placement and application system used by the entirety of the SCI movement to process applications to workcamps, which are short term volunteering projects offered by different branches and partners of SCI. The information collected through this system is voluntarily provided by the data subjects as it is necessary for the processing of their applications and their participation in the project.

In the OPS, the individual creates an account and through this account is able to apply to different workcamps available in the system. Each workcamps may require different types of information, including personal data. The individual is then accepted into a workcamp and the organizers of the workcamp have access to this data for 3 years before all data is anonymized (removing any personal information tied to the application). The data is used in 4 different capacities:

- For the placement of the individuals in the different workcamps they have applied for, giving access to their information to both the hosting and sending organizations. The sending

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[4] Please find the GDPR regulations concerning Google here: https://cloud.google.com/security/gdpr

[5] Please find the GDPR regulations concerning Microsoft here: https://www.microsoft.com/en-us/trust-center/privacy/gdpr-overview

organization also charges a fee for this service, though SCI IS is completely removed from the payment process.

- For year's statistics in order to analyze how different workcamps are performing, the distribution of the type of individuals taking part in the workcamps as well as the time of year the workcamp placements seem to be busiest.
- In order to send follow-up questionnaires to the individuals who have taken part in a workcamp and who have indicated that they are comfortable with being contacted after their workcamp has finished. This is normally done through the Online Evaluation System (OES).
- For the project organisers to meet needs and requests from individual volunteers, such as dietary requests, special medical conditions they need to be aware of, emergency contacts, and any other personal information that the volunteer spontaneously include in the application.

Online Evaluation System (OES)

The OES is a system SCI IS uses in order to send out questionnaires about different topics and as an evaluation mechanism for workcamps. The questionnaire is sent after workcamps have taken place and are only sent to the individuals who have given their consent to be contacted further/for additional information. Some personal information is collected through these questionnaires.

The data is used to analyze the quality of the workcamps attended by these individuals and does not use the personal data for any other reason. SCI IS is the holder of this information, while the participating branches are able to access the data.

Online Learning System (OLS)

The Online Learning System requires users to make an online account in order to follow different online courses available. Outside of the email required for the account, users are also required to give their Name and username as part of the registration process. The name will be used on the certificate for the completion of the course.

Application Records

Applications for unsuccessful candidates are deleted after 1 year unless otherwise agreed with the unsuccessful candidate. This refers to applications of any type, including staff positions, volunteer positions, freelance tenders, etc.

Communication Platforms

There are several streams in communication for which personal information is collected, namely:

- Mailing lists ● Newsletters
- Donor management

For all data streams, the information provided that communications staff use to send information, campaigns, etc. has been given voluntarily through different forms – this data has not been collected, stored or used for any purposes besides those with which the individual has consented and given their permission to use. For example, the newsletter mailing lists consist only of those individuals who have

signed up explicitly for the newsletter on the form on the website. The data only consists of the individual's email address and name – no other information is collected or stored.

SCI IS also has an external platform called the "Member's Area". Personal data is collected and stored in order to use the platform such as name and email addresses, as well as the organisation authorising them to use the platform. Personal data is currently not used for anything outside of the use of the platform.

Insurance Information

SCI IS provides an insurance scheme that can be used by the whole movement in case injuries occur during workcamps or other events organized by SCI IS that are not covered through an insurance scheme of an externally funded project.

In case an insurance claim needs to be made, personal data including health data is shared by SCI IS with the insurance company in order to process the claim. This information is collected through a form that is then scanned and stored. This information is stored for at least 15 years for the security of SCI IS in processing the claims. The data collected is used for two reasons:

- Processing the insurance claim with the insurance company, as well as reimbursing any costs created as a result of the injury;
- Statistics on injuries taking place during workcamps – types of injuries, types of workcamps, severity of the injury, location of the workcamp, etc.

All the information streams expressed below will be managed and safeguarded in different ways. However, the manner in which SCI IS will share data with other organizations or recipients will be consistent across the data streams. This information will be further outlined in the Compliance plan.

Compliance Plan

The following section outlines the compliance plan in place in order to comply with the GDPR. In order for the compliance plan to be efficient, each data stream will have its own system for compliance. Furthermore, general conditions will be set on data SCI IS holds as a whole, as well as the internal systems used within the office.

General Conditions

SCI IS is committed to ensuring all data is held safely and securely. Consequently, ensuring transparency and security of the data, as well as an adherence to the "Right to be Forgotten" will be strictly adhered to.

All data within SCI IS will be made anonymous or deleted five years after it was gathered unless specified differently. The data will be held on an appropriately secure platform and only available to SCI IS staff, hosting and sending partners during exchange programs, project partners and other recipients made necessary by externally funded projects. Further information on the time of deletion by the recipient will be shared later in the document.

SCI IS uses Google Drive and Microsoft 365 in order to store data, as well as files held securely on office desktops and laptops used for work with access to the Google Drive and Microsoft 365 application. These files will be checked yearly in order to anonymize or delete data past their statute, unless consent has been expressly given to hold the information for a longer period of time.

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Consent for storing personal data for a longer period of time should be gathered and stored for clarification. The data subject will still be able to exercise their right to be forgotten. At any point after the needed time SCI IS needs to store data, a data subject may approach SCI IS to either receive information on the data SCI IS holds or with a request to be forgotten. SCI IS endeavors to process all requests within a month. This covers all the different data streams mentioned in the Data Audit.

Management and Storage of Personal Data

How personal data is managed and the legal basis by which SCI IS can process personal data differs on a case-by-case basis. The table below outlines actions taken in order to accurately manage SCI IS's data. For activities not mentioned here and for future possible activities, SCI IS will store personal data for up to 3 years unless given explicit permission otherwise.

Data Stream	Activities	Legal Basis	Stored for 'X' Years until Deletion
Externally Funded Projects	Collection of Data during application processes to activities	Contractual Necessity	Up to 10 years
	Collection of Data – Signature Lists	Contractual Necessity	Up to 10 years
	Use of pictures for promotion and reports	Consent	Until Consent is retracted
	Consent for further communication, including newsletters	Consent	Until Consent is retracted
Online Placement Systems (OPS)	Applications for Workcamps	Legitimate Interest	3 years
	Sharing of Application information with hosting/sending organisations	Legitimate Interest	1 year
	Contact information for sharing of workcamp info-sheets	Legitimate Interest	1 year
	Follow-up Questionnaires based on workcamp using OES	Consent	Until Consent is retracted
	Storing of Contact Data with consent after workcamps have finished	Consent	Until Consent is retracted
Online Evaluation System	Processing of data collected through OPS questionnaires	Consent	Until Consent is retracted
Online Learning System	Creation of Account to follow online courses	Consent	Until Consent is retracted
Communication Platforms	Collection of contact information for newsletters (only email)	Consent through direct subscription	Until Consent is retracted
	Use of pictures, images, quotes, etc for communication and dissemination purposes	Consent collected through third party	Until Consent is retracted

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	Members Area – contact information collected to create profile	Consent through direct subscription	If User is inactive for more than 10 years or consent is retracted
Application Records	Information collected during application process	Consent	1 year or if longer consent is given
Insurance Claims	Processing of Personal Data for Insurance Claim	Contractual Necessity	10 years
	Sharing of Insurance Claim information with Insurance Provider	Contractual Necessity	10 years
Donation Information	Processing of information through Donorbox and other payment platforms	Legitimate Interest	Financial obligation timeline

Sharing and Deletion of Personal Data with third parties

There are several cases where personal data may be shared with a third party. Information shared will either be done securely through locked Google documents or as a consequence of the need to share information for logistical arrangements. In case personal data is shared, the recipient agrees to delete the information after an agreed upon time, indicated below:

Deletion of Data by Recipients

Type of Activity	Type of Data	Location Data Collected	Recipient	Time of Deletion after sharing
Workcamps	Personal Data	Application Form	Hosting/sending organisation	1 year
Projects Activities (SCI IS is applicant)	Personal Data	Application Forms, Participants lists / Registration forms	Project Partners	1 year
	Personal Data	Reporting/Signature lists	External Funders	Until contract states limitations, normally 3-10 years
	Personal Data	Processing – Logistical Arrangements	Logistics organisers	Project end date
Insurance	Personal Data	Insurance claims	Insurance Company	10 years

Long-term Volunteer Application and Contracts	Personal Data	Application Forms, Contracts	Sending Organisations	3 years unless given permission to hold longer

Notification of Data Subject

All data subjects will be notified of the data collection during the time of collection. Explicit information will be given on the uses of the information collected, the processing and sharing of the information, the legal basis SCI IS has for obtaining and using the data, the length of time data will be stored until it is deleted and the rights of the data subject to request summaries of the data stored. Data subjects will be asked to make sure they understand the privacy statements before information is processed. Furthermore, unless other legal basis have been identified, consent will be asked explicitly using simple language and data subjects will be given clear information on how to withdraw their consent at a future date.

During data collection, data subjects will be given clear privacy statements tailored to the data stream and type of activity they will be participating in. This privacy statement will be linked to the larger privacy policy made available on the SCI IS website and will ask whether the data subject has understood all the terms or ask for their explicit permission to continue. The answer of the data subject will be stored accordingly or not processed in case no agreement has been reached.

Further Information

The following outlines the different documents SCI IS will make publicly available covering all the data streams and activities. Privacy notices will be created for each activity derived from the DACP and SCI IS's Data Protection Plan and all documents will be reviewed and updated annually. All documents will be publically available on the associated websites. These documents include:

- Data Protection Policy
- Privacy Notices will be created for:
- SCI IS Website (extended to Member's Area)
- Online Placements Systems (OPS)
- Online Learning Platform
- SCI IS Newsletters

Furthermore, a shorter privacy notice will be provided before actions taken from the user allows us to store personal data which will include a link to the full privacy notice as well as the Data Protection Policy.

++END PLAN++