



Data Protection Policy

The Association of Service Civil International ivzw

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Definitions

SCI	means The Association of Service Civil International ivzw, a registered charity
GDPR	means the General Data Protection Regulation
Responsible Person	means Chantal Doran, International Coordinator of SCI
DACP	refers to SCI's Data Audit and Compliance plan outline all the streams of data or contexts in which personal data is processed by SCI

1. Data protection principles

SCI is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR¹ requires that personal data² shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to

¹ Regulation (EU) 2016/679 (General Data Protection Regulation) – <https://gdpr-info.eu>

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



implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

- a. This policy applies to all personal data processed by the SCI.
- b. The Responsible Person shall take responsibility for the SCI's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. SCI shall register with the Information Commissioner's Office as an organisation that processes personal data in case necessary.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, SCI shall maintain a DACP.
- b. The DACP shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to SCI shall be completed within 30 days.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests³.
- b. SCI shall note the appropriate lawful basis in the DACP.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in SCI systems.

5. Data minimisation

- a. SCI shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. SCI shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

³ <https://gdpr-info.eu/art-6-gdpr/>



7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, SCI shall put in place an archiving policy for each area in which personal data is processed, available in the DACP and will review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. SCI shall ensure that personal data is stored securely within reasonable means using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. Information will be shared with third parties only if necessary and in an appropriately secure manner.
- d. When personal data is deleted this should be done safely such that the data is irrecoverable.
 - e. Appropriate backup and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, SCI shall promptly assess the risk to people's rights and freedoms and if appropriate, report this breach to the national privacy commission of Belgium.

++END OF POLICY++