

<b>Policy No. 6.2: Protection of Personal Data and Information</b>	
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Governing Authority: EXCO	
References: <a href="https://gdpr.eu/">https://gdpr.eu/</a> ; <a href="https://gdpr.eu/checklist/">https://gdpr.eu/checklist/</a>	
Corresponding Policy: Post Congress procedures, Committee policy	
Associated document: Data sharing approval form, Data Privacy policy for IFSHT, Right to Erasure Request Form	

**Purpose:** In 2016-2018 the European union put into effect the EU general data protection regulation (GDPR). This regulation applies to personal data that is stored and used for the purposes of an organisation or business. Other countries have similar policies. This policy is to ensure that we are in compliance with the GDPR regulations.

**Policy:** IFSHT will follow the guidelines outlined in the regulation to ensure that all of our business transactions, use of personal data, storage of that data and information obtained over our website and emails are in compliance with this regulation.

### **Definitions:**

**Personal data** — Personal data is any information that relates to an individual who can be directly or indirectly identified. Names and email addresses are obviously personal data. Location information, ethnicity, gender, biometric data, religious beliefs, web cookies, and political opinions can also be personal data. Pseudonymous data can also fall under the definition if it's relatively easy to identify someone from it.

**Data processing** — Any action performed on data, whether automated or manual. The examples cited in the text include collecting, recording, organising, structuring, storing, using, erasing... so basically anything.

**Data subject** — The person whose data is processed. These are your customers or site visitors.

**Data controller** — The person who decides why and how personal data will be processed. If you're an owner or employee in your organisation who handles data, this is you. At IFSHT it will be the role of the president and secretary general.

**Data processor** — A third party that processes personal data on behalf of a data controller. The GDPR has special rules for these individuals and organisations.

## **Principles**

If you process data, you have to do so according to seven protection and accountability principles.

1. **Lawfulness, fairness and transparency** — Processing must be lawful, fair, and transparent to the data subject.
2. **Purpose limitation** — You must process data for the legitimate purposes specified explicitly to the data subject when you collected it.
3. **Data minimisation** — You should collect and process only as much data as absolutely necessary for the purposes specified.
4. **Accuracy** — You must keep personal data accurate and up to date.
5. **Storage limitation** — You may only store personally identifying data for as long as necessary for the specified purpose.
6. **Integrity and confidentiality** — Processing must be done in such a way as to ensure appropriate security, integrity, and confidentiality (e.g. by using encryption).
7. **Accountability** — The data controller is responsible for being able to demonstrate GDPR compliance with all of these principles

## **Policy:**

1. Emails-
  - a. Any email addresses that are used in communication or posted on the website must be with consent.
  - b. Email addresses obtained via applications for committees, grants or other funding can be utilised and once they are no longer needed, they need to be deleted from Teamwork (or whichever online workplace portal is being used).
  - c. When emailing a group of people outside the committees of IFSHT, the emails of the other recipients should not be visible to the others receiving the email. This can be done by using the “bcc” section of an email or by using Constant Contact® for the message.
  - d. All people joining any IFSHT committee will complete a form approving the sharing of their e-mail address to be used for IFSHT internal business.
2. Applications and forms
  - a. If an EXCO member should download any shared forms or applications to their personal computer, then they must delete this information when the information is no longer needed.
  - b. Information sent to individuals that would include their personal information for travel arrangements or reimbursement of expenses need to be sent via secure (encrypted) email.

### 3. Website-

- a. Only an individual can sign themselves up as a user on the website. This is managed by a new user needing two factor authentication to activate their account.
- b. Listing of emails under sections such as delegates, post graduate courses, visit a clinic needed to be updated annually.
  - i. The information officer is responsible for updating the delegates of the website once the new delegate information is received from the secretary general.
  - ii. The education committee is responsible for making sure the post graduate courses are reviewed yearly and ensure that the contact information is still valid.
  - iii. For visit a clinic, this is the responsibility of the user that has posted the information. The information officer reviews the clinic information before it is posted on website
    - 1. The education committee will review the Visit a clinic each triennium to ensure that the emails and website are still working and correct.
  - iv. At the beginning of each triennium the information officer will remove applications and forms that are over 10 years old except for membership applications and newsletter sign up.

### 4. Newsletters (Reach, Ezine)

- a. Newsletters and other communications are only received if a user has signed up to receive this information.
- b. All communications have an “unsubscribe” button to ensure that people who no longer wish to receive this information are removed from the list.
- c. The recipient can also request that their contact is removed from the list.

### 5. Permissions

- a. Permission is required to post any information of an individual in any IFSHT communication
  - i. This includes photos and names on website including grant recipients
  - ii. Photographs and names from IFSHT events will be used in communications. For the website, should anyone object to personally being in the photo or having their name listed, they may ask for it to be withdrawn. This will be actioned within two working weeks.
  - iii. Photographs can be taken if a person is not identifiable, or people realise that photos are being taken. However, if the photo is of a small group of people (for example 1 or 2 people at a silent auction table) then permission should be asked of those people before taking the photo.

- iv. Photos submitted to the newsletter and/or EZINE that are not the property of IFSHT needed to be vetted to make sure the people in the photo have given permission for its use in IFSHT communications. This is the responsibility of the information officer when they receive a photo.

6. Teamwork (or another workplace portal)

- a. Personal information needs to be removed from Teamwork once it is no longer deemed necessary. This includes
  - i. Grant applications – Primary information such as name, email address and the grant awarded will be transferred to a spreadsheet and all other information will be removed within ten to fifteen years after the grant is awarded. This should be completed by the current secretary general.
  - ii. Membership applications – All membership applications should be kept on teamwork even if they are no longer a member. This is to keep relevant information that may be needed for future applications.
  - iii. In the first year of the triennium the president, past president secretary general and Treasurer will meet to remove information from teamwork that is no longer needed.

7. Wire transfers

- a. Bank details and reimbursement information for individuals and one-off payments should be removed from the treasurer's personal computer once the payment has been successfully completed and all forms, invoices and receipts have been uploaded to Aplos and Teamwork.
- b. Bank details and reimbursement information for regular suppliers can be retained.
- c. Invoices from suppliers must be retained.
- d. Invoices for committee expenses must be retained
- e. For any suppliers who are no longer used by IFSHT, wire transfer information will be removed.
- f. Receipts and banking details for individual reimbursements should be removed from Teamwork 10-15 years after payment. This will be completed by the Treasurer.

8. Donations:

- a. All donors' names may be published in Newsletter and announced at the triennial congress unless the donor expressly states that they want to remain anonymous
- b. Any committee discussions pertaining to donations will be conducted in accordance with the individual donor's expressed wishes and done with the upmost sensitivity.