

Data Protection Policy

Last updated	August 2020
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Data Protection	A system by which all data collected, shared and archived is securely protected on site of ISS.
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1. Data Protection Principles

ISS is committed to processing data in accordance with its responsibilities for data protection.

ISS will ensure that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals.
- b. Collected for specific ISS casework purposes which include statistics.
- c. Accurate and, where necessary, kept up to date; steps must be taken to ensure that personal data that are inaccurate, are erased or rectified without delay.
- d. Kept in a form which permits identification of data subjects for as long as necessary.
- e. Stored for longer periods insofar as the personal data will be processed solely for archiving or statistical purposes.
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

2. General Provisions

- a. This policy applies to all personal data processed by ISS in line of its mission and activities.
- b. Each ISS member shall take responsibility for compliance with this policy and according to



National data protection laws in force.

- c. This policy shall be reviewed at least annually and updated if needed.
- d. The ISS General Secretariat shall register with the relevant authority in Switzerland and where appropriate by ISS in their own country, as an organisation that collects and processes personal data.

3. Transparent Data Processing and Access

- a. To ensure its processing of data is lawful, fair and transparent, the ISS shall maintain a register of data collection and processing.
- b. The register shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the ISS shall be dealt with in a timely manner.

4. Lawful Purposes

- a. All data processed by the ISS must be done on one of the following lawful bases: cross border casework related, consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of consent shall be kept with the personal data.
- c. 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 the ISS's systems.

5. Data Minimization

- a. The ISS will ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed namely cross border casework and according to ISS methodology.

6. Accuracy

- a. The ISS shall take reasonable steps to ensure personal data is accurate and kept up to date.
- b. A record of updates and deletion should be kept as possible within the register in point 3.

7. Archiving / Removal



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

8. Security

- a. ISS shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to authorized staff.
- c. Appropriate protection should be in place to avoid unauthorized sharing of information.
- d. When personal data is deleted this should be done safely in such a way that the data is irretrievable.
- e. Appropriate back-up and recovery solutions will be developed by ISS.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, the ISS shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the appropriate individual and relevant national authority within 48 hours.

**ISS is a generic term applicable to ISS GS, ISS AI and the ISS members as relevant

Next revision: November 2020

A handwritten signature in black ink, appearing to read 'Jean Ayoub'.

Jean Ayoub
Secretary General
International Social Service

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