



Dorcac

Data Protection Policy

Version: 18.2 (definite)

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1. Context and overview

1.1 Key details

- ✓ Policy prepared by : Nico Hoogenraad
- ✓ Approved by MT on : May 7th, 2018
- ✓ Policy became operational on : May 25th, 2018
- ✓ Next review date : April 30th, 2021

1.2 Introduction

Dorcas needs to gather and use certain information about individuals. These can include supporters, beneficiaries, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the organisation's data protection standards – and to comply with the law.

1.3 Why this policy exists

This data protection policy ensures that Dorcas:

- ✓ Complies with data protection law and follow good practice
- ✓ Protects the rights of staff, beneficiaries, customers and partners
- ✓ Is open about how it stores and processes individuals' data
- ✓ Protect itself from the risks of a data breach

1.4 Data protection law

In the Dutch setting, there are a few laws and institutions we have to reckon with:

1.4.1. Algemene Verordening Gegevensbescherming

The Algemene Verordening Gegevensbescherming or the AVG lays the framework how organisations have to protect the information of third parties that they keep in the context of their 'business'. In order to prevent data loss, organisations need to protect the information by taking technical and organisational measurements. They have to use modern techniques to protect personal information, while also how the organisation handles this information, like who has access to the information? Organisations are required to think about the safety of the information beforehand, before they will start collecting data, but it also needs continual attention within the organisation to keep it up-to-date and sufficient for the development of technology.

Some of the areas of attention in this law are:

- ✓ Transparency, appropriateness, legality, accuracy
- ✓ Processing where necessary;
- ✓ Confidentiality
- ✓ Security in-house
- ✓ Security when processed by third parties
- ✓ Measurements in a plan-do-check-act cycle
- ✓ Measurements based on risk analysis
- ✓ Measurements based on security standards
- ✓ Measurements based on processing by third parties



- ✓ Agreements for processing by third parties
- ✓ Oversight over compliance to agreements
- ✓ Reliability requirements
- ✓ Evaluation and adjustments

1.4.2. Law on notification data leaks

Since January 1st, 2016, the ‘Wet Melding Datalekken’ is applicable. This law stipulates that each organisation has to notify the ‘Authority Personal Information’ as soon as it has become clear that there has been a serious data leak from the information they keep on personal information of individual people and or organisations.

A data leak is defined as access, destruction, modification or release of personal information from an organisation, without it being the intention of the organisation. Also unlawful processing is considered to be a data leak. We have to speak of a data leak if there has been a breach on the security of personal information as explained in article 13 of the Law on protection of personal information. With a data leak personal information has been subject to loss or illegal processing – to those things for which security measures should have prevented. This includes loss of USB sticks, a stolen laptop or unwanted access in data files by a hacker.

1.4.3. Authority Personal information

The ‘Autoriteit Persoonsgegevens’ supervises compliance of privacy legislation on registration of personal information. The authority investigates the developments, advises on new legislation, informs the public on rules and regulations and receives and processes tips on breaches of legislation, on which they can launch specific investigations.

Next to these, organisations that have discovered data leaks have to report these to the Authority by means of a fixed procedure. We refer to the ‘Protocol data leaks’ for further information about the procedure.

2. People, risks and responsibilities

2.1 Policy scope

This policy applies to:

- ✓ Dorcas headquarters in the Netherlands
- ✓ All branches of Dorcas, known as ‘country offices’
- ✓ All legal entities in other countries that de facto operate as Dorcas country offices
- ✓ All DFO’s (Dorcas Fundraising Organisations) in countries where the prime activity for Dorcas is fundraising and not implementing projects
- ✓ All Dorcas staff and volunteers
- ✓ All contractors, suppliers and other people working on behalf of Dorcas that get to work with the data that Dorcas holds

It applies to all data that Dorcas holds relating to identifiable individuals, companies and organisations, even if that information technically falls outside of the Algemene Verordening Gegevensbescherming. This data can include:



- ✓ Names of individuals
- ✓ Postal and physical addresses
- ✓ Email addresses
- ✓ Telephone numbers
- ✓ Donation information
- ✓ Way of involvement with Dorcas
- ✓ Salary payments and personnel files
- ✓ Plus any other information relating to individuals, companies and organisations

2.2 Data protection risks

This policy helps to protect Dorcas from some very real data security risks, including:

- ✓ **Breaches of confidentiality.** For instance, information being given out inappropriately.
- ✓ **Failing to offer choice.** For instance, all individuals should be free to choose how Dorcas uses data relating to them, whether to receive direct mailing and how many times.
- ✓ **Theft.** For instance, information unlawfully obtained by third parties like hackers, which can be used for alternate objectives.
- ✓ **Reputational damage.** For instance, Dorcas will suffer if sensitive data becomes available in ways and manners in which Dorcas did not intend to have it become available.

2.3. Responsibilities

Everyone who works for or with Dorcas has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- ✓ The **board of directors** is ultimately responsible for ensuring that Dorcas meets its legal obligations.
- ✓ The **director of finance and supporting services** also functions as the responsible officer for ICT security, and is responsible for:
 - Keeping the board updated about ICT and data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies annually.
 - Arranging ICT and data protection training and advice for the people covered by this policy.
 - Handling ICT and data protection questions from staff and anyone else covered by this policy.
 - Checking and approving any contracts or agreements with third parties that may handle Dorcas' sensitive data.
- ✓ The **ICT coordinator** is responsible for:
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.



- Evaluating any third-party services the company is considering using to store or process data, for instance cloud computing services.
- ✓ The **Country Directors** are responsible for dealing with ICT and data-protection within the sphere of the Dorcas country offices, as concerning to local donors, beneficiaries, staff and other parties, especially but not limited to where it pertains to individual information that Dorcas obtains from beneficiaries to be used within its programmes.
- ✓ The **manager of Resource Mobilisation and Communities** is responsible for dealing with requests from individuals to see the data Dorcas holds about them (also called 'subject access requests') and all rights that people have according to the AVG in connection to the information that Dorcas holds on them.
- ✓ The **manager of Resource Mobilisation and Communities** is also responsible for:
 - Approving any data protection statements attached to communications such as e-mails or letters or expressed in direct marketing letters, news magazines or online marketing.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

3. General staff guidelines

- 1) The only people able to access data covered by this policy should be those who **need it for their work**.
- 2) Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- 3) Dorcas **will provide training** to all employees to help them understand their responsibilities when handling data.
- 4) Employees should **keep data secure**, by taking sensible precautions and following the guidelines in this policy.
- 5) In particular, **strong passwords must be used** and they should never be shared. All passwords to the computer network, intranet, CRM, Cobra, Twinfield and other (cloud) software solutions should be changed regularly and compulsory, depending on the possible exposure that unauthorised password usage brings about. Keeping passwords the same for extended periods for more than a year is not allowed.
- 6) Personal data should **not be disclosed** to unauthorised people, either within the company or externally.
- 7) Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of or anonymised.
- 8) Employees **should request help** from their line manager or the finance director if they are unsure about any aspect of data protection.

4. Data storage

These rules describe how and where data should be stored safely. Questions about storing data safely can be directed to the IT manager or the finance director.



When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot access it. These guidelines also apply to data that is usually stored electronically, but has been printed out for some reason:

- ✓ When not required, the paper of files should be kept in a **locked drawer or filing cabinet**.
- ✓ Employees and volunteers should make sure paper and printouts are **not left where unauthorised people can access them**, like on or near a printer. (In this context, it is important that volunteers working with these data will get the same instruction and same training as employees.)
- ✓ **Data printouts should be shredded and disposed** of securely when no longer required. This can be done either with the help of some shredders in the offices, or at HQ – especially when it concerns large quantities - by depositing it in the container that is available just before the Dorcas Shop entrance. The contents of this container will be shredded by a third party.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- ✓ Data should be **protected by strong passwords** that are changed regularly and never, ever shared between employees. Where temporary employees take over tasks from regular employees, they should have their own passwords and not use the passwords from the regular employees.
- ✓ If data is **stored on removable media** (like a CD, DVD, USB stick, laptop or portable hard drive, these should be kept locked away securely when not being used. When necessary transport has to take place, utmost care should be taken they are not left behind in a car or other public places where others can take the removable media or access them unauthorised. The one transporting the media should at all times keep them with himself or store them safely at his or her residence. Be aware that a lot of data loss happens through loss of the portable devices!
- ✓ Data should only be stored on **designated drives and servers**, and should only be uploaded to **approved cloud services**.
- ✓ Servers containing personal data should be **sited in a secure location**, away from general office space. This is true for both HQ and field offices.
- ✓ Data should be **backed up frequently**. Those backups should be tested regularly, in line with Dorcas's standard backup procedures.
- ✓ Data should **never be stored** to local hard drives, laptops or other mobile devices like tablets or smart phones. If for some reason it is temporarily necessary to transport data on a laptop, please refer to what has been said about data stored on removable media.
- ✓ All servers containing data and all 'clients' (laptops, desktops and thin clients) should be protected by **approved security software and a firewall**.

5. Data use

Personal data is of no value to Dorcas, unless it can make use of it. Therefore, Dorcas will only record data that is of use to Dorcas for its goals (minimal data processing). However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft. Therefore:

- ✓ When working with personal data (think of CRM, Twinfield, Cobra, etc.), employees should ensure the **screens of their computers are always locked when left unattended**.



- ✓ Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure. This particularly applies to sending scans of passports by e-mail.
- ✓ Personal data must be **encrypted before being transferred electronically**. The IT coordinator will provide means to do this and can explain how to send data in this manner to authorised external contacts.
- ✓ Remote access to servers at HQ can **only be made through VPN** (Virtual Private Network) with proper authentication.
- ✓ Personal data of people within the European Economic Area **should not be stored or transferred outside of the European Economic Area**.
- ✓ Employees should **not save copies of personal data to their own computers**. Always access and update the central copy of any data.

6. Data accuracy

The law requires Dorcas to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort Dorcas should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- ✓ Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- ✓ Staff should take every opportunity to ensure **data is updated**. For instance, by confirming a customer's details when they call.
- ✓ Dorcas will make it **easy and safe to update the information** for 'data subjects' that Dorcas holds about them, for instance via the company website.
- ✓ Data should be **updated as inaccuracies are discovered**. For instance, if a supporter or volunteer can no longer be reached on their stored telephone number, it should be removed from the database; or if snail mail is returned, the address should be either deleted or marked as inaccurate in the database.
- ✓ It is the manager of Resource Mobilisation and Communities' responsibility to ensure **marketing databases are checked against industry suppression files** (to check for obsolete and redundant addresses) whenever it is deemed necessary.

7. Subject access requests

All individuals, companies or organisations who are the subject of personal data held by Dorcas are entitled to:

- ✓ Ask **what information** Dorcas holds about them and why.
- ✓ Ask **how to gain access** to it.
- ✓ Be informed how **to keep it up to date**.
- ✓ Ask that wrong information be **rectified**.
- ✓ Ask that their information will be **deleted or anonymised**.
- ✓ Ask that Dorcas will only use the information after **prior approval**.
- ✓ Be informed how the company is **meeting its data protection obligations**.



If an individual, company or organisation contacts Dorcas requesting this information or expressing their rights, this is called a 'subject access request'.

Subject access request should be made by e-mail, addressed to info@dorcas.nl or alternatively by mail to Post Office Box 1500, 1300 BM Almere, or by telephone through the receptionist at +31 88 050 2800. The team leader Back Office will handle the request and will make sure the requesting party is appropriately answered by providing the relevant data within 14 days, after the identity of the requesting individual, company or organisation has been established.

8. Disclosing data for other reasons

In certain circumstances, the AVG or other Dutch or foreign legislation allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Dorcas will disclose requested data. However, the director of finance and supporting services will ensure the request is legitimate, seeking assistance from the board and where necessary from legal advisers where necessary.

If Dutch law is not in accordance with foreign law, especially when compared with legislation of the United States of America, Dutch law prevails to determine whether information will be disclosed.

9. Providing information

Dorcas aims to ensure that individuals are aware that their data is being processed, and that they understand:

- ✓ How the data is being used
- ✓ How to exercise their rights

To these ends, Dorcas has a privacy statement for the Dutch setting, spelling out how data relating to individuals is used by Dorcas. This statement is attached to this policy.

10. Project participants rights

Everything that is stipulated in this policy, is also applicable for data that Dorcas needs and collects of beneficiaries, in the context of the implementation of the Dorcas programs. The same precautions must be taken with beneficiary data as with all other individual data information. Moreover, there are additional privacy guidelines that Dorcas adheres to when it comes to privacy rights of beneficiaries, which are in the process of being put down in Dorcas privacy guidelines for beneficiaries, which includes stipulations about consent for use of photographic material, not using information and photographs outside of the context, guarding the dignity of beneficiaries and appropriate use of information.



Enclosure 1 – Privacy Statement

Persoonsgegevens die Dorcas verzamelt, gebruikt Dorcas alleen voor het doel waarmee je ze aan Dorcas hebt gegeven. Daarmee voldoet Dorcas aan de privacywetgeving.

Wat zijn persoonsgegevens?

Een persoonsgegeven is informatie die herleidbaar is tot een persoon. Voorbeeld van een persoonsgegeven is een naam of een huisadres (NAW), maar ook e-mailadressen en de verstrekte donaties in combinatie met NAW-gegevens kunnen persoonsgegevens zijn.

Vastleggen en verwerken van gegevens

Daar waar jouw persoonsgegevens verwerkt worden, staat precies vermeld welke gegevens voor welke [doeleinden](#) gebruikt worden. Dorcas gebruikt je persoonsgegevens enkel voor het doel waarvoor je ze hebt gegeven. We garanderen dat je gegevens niet worden gebruikt voor andere doelen dan voor informatieverstrekking en het verhogen van je betrokkenheid bij de projecten van Dorcas. Het betekent ook dat Dorcas je gegevens niet gebruikt voor andere doeleinden dan voor deze doeleinden. Dorcas zal nimmer adressen verkopen of beschikbaar stellen aan derde partijen om voor zichzelf te gebruiken.

Dorcas registreert enkel iemands persoonsgegevens wanneer je hiervoor [toestemming](#) geeft. Als jij je opgeeft voor de nieuwsbrieven van Dorcas of je aanmeldt als donateur, sponsor of vrijwilliger, wanneer je een klacht indient of een overeenkomst aangaat met Dorcas, beschouwen we dat als toestemming om je persoonsgegevens te registreren.

Dorcas [verwerkt in of koppelt aan](#) je persoonsgegevens zo mogelijk je naam, geslacht, adres, geboortedatum, telefoonnummer, e-mailadres, huwelijkse staat, kerkelijke gezindte, eventuele kinderen en/of nabestaanden en indien nodig (ten behoeve van overeenkomsten voor periodieke giften) het BSN-, paspoort of rijbewijsnummer. Indien verder van toepassing registreren we ook de 'rol' die je speelt ten opzichte van Dorcas, zoals: particulier, ondernemer, vrijwilliger, periodieke giftgever, sponsor, testateur.

Je hebt het recht om een [klacht](#) in te dienen, die volgens onze klachtenregeling behandeld zal worden. Dat kan via onze website (<https://dorcas.nl/klacht-doorgeven/>). Je hebt verder het [recht op inzage](#) in of verstrekking van de gegevens die we van je hebben geregistreerd en ook om die te laten wijzigen indien ze niet correct zijn. Je kunt ook je [gegevens laten verwijderen](#) of – indien wettelijke bepalingen dit tegenhouden – onherkenbaar laten maken. We verwijzen je hiervoor naar de Dorcas Data Protection Policy die op onze website staat.

Persoonsgegevens worden niet langer [bewaard](#) dan nodig is voor het doel waarvoor de gegevens gevraagd zijn. Door het beschikbaar stellen van je gegevens, geef je ons toestemming om je persoonlijke gegevens op te slaan in onze database en die te gebruiken voor het doel waarvoor je deze aan ons hebt gegeven. Deze toestemming en bewaartermijn zijn vastgelegd in de Algemene Verordening Gegevensbescherming.

Zolang jouw relatie met Dorcas actief in stand blijft, bewaren we je persoonsgegevens. Wanneer er gedurende vier jaren geen contact of donatie is geweest, benaderen we je nog maar één keer per



jaar via onze mailings. Wanneer er zeven jaren voorbij zijn gegaan zonder contact of donatie, krijg je van ons een verzoek om aan te geven of je nog nieuws van Dorcas wilt blijven ontvangen.

Omdat Dorcas naast giftgevers van geld ook mensen hebben die met hun tijd of gebed het werk ondersteunen, [wissen we niet automatisch](#) je gegevens omdat we geen donaties meer van je hebben ontvangen.

Voor alle verwerkingen van persoonsgegevens geldt dat alleen die gegevens worden gebruikt, [die je zelf hebt achtergelaten](#) of op een andere manier tot ons komen, zoals je bankrekeningnummer als je iets aan Dorcas overmaakt. Als je verhuist en ons niet informeert, dan proberen we je nieuwe adres te achterhalen. Als je dat niet wilt, kun je ons altijd laten weten dat je geen prijs meer stelt op onze berichten. Alle gegevens worden vertrouwelijk behandeld. De persoonlijke gegevens worden alleen vrijgegeven met jouw uitdrukkelijke toestemming. Jouw persoonlijke gegevens stellen we niet aan derden beschikbaar, tenzij we dit op grond van de wet verplicht zijn.

Dorcas kan vragen om je [locatiegegevens](#) op mobiele apparaten. Deze gegevens worden dan alleen gebruikt om je zo goed mogelijk van dienst te zijn bij het verstrekken van informatie. Deze gegevens worden alleen gebruikt wanneer je hier toestemming voor hebt gegeven.

Je bepaalt zelf welke gegevens aan wie ter beschikking worden gesteld. Als er zogenaamde [profielen](#) worden bijgehouden, dan worden die uitsluitend gebruikt om de website beter af te stemmen op de behoefte van de gebruiker en wordt dat van te voren meegedeeld.

Gegevens kunnen echter wel worden gebruikt voor [opsporing](#), als strafbare feiten worden gepleegd of strafbare uitlatingen worden gedaan (en verdere uitzonderingen zoals genoemd in art. 43 WBP).

Als je jouw gegevens wilt inzien, laten corrigeren of verwijderen, dan kun je een [verzoek](#) bij ons indienen door een e-mail te sturen naar info@dorcas.nl.

