



Procedure: Data Privacy

Awareness

All InterClimate Network (ICN) Trustees, Associates, and Delivery Partners and Volunteers where appropriate, will be asked to confirm that they have read and understood, and will act in accordance with, ICN's Data Privacy and Procedure. They will be offered training and advice as requested. The ICN Operations Manager will be responsible for ensuring new people are aware of the Policy and Procedure, and reconfirming that annually.

Protecting Personal Data

The ICN Operations Manager will conduct an Annual Personal Data Audit to confirm as appropriate with Trustees, Associates, Volunteers and Partners that:

- no personal information is being kept longer than necessary;
- any paper records and memory sticks are kept securely, and that memory sticks have password protection;
- PCs have standard internet security and anti-virus software;
- personal information on Dropbox is kept to a minimum and any redundant information deleted;
- no data defined by GDPR as 'sensitive' (eg racial or ethnic origin, political opinions, religious or philosophical beliefs) has been collected or stored.

Consent

The ICN Operations Manager will assess annually, and keep a record of, on what basis we lawfully keep and process an individual's personal information (the 'what/why' Table in ICN's Data Privacy Policy). The 'what/why' table will be endorsed by the Board of Trustees (who act as ICN's Data Controller).

For ICN's 'direct marketing' activities, ICN's Operations Manager will ensure that there is a record of the legitimate basis for including names on the circulation list, and that an easy means of opting-out in future is included in the marketing material.

In the event of any mass marketing/fund-raising, the ICN Operations Manager will ensure either that direct consent is obtained, or that those approaching personal contacts (eg for donations) consider their 'targets' individually.

Email

Extensive email messages between ICN Trustees, Associates, Delivery Partners and Volunteers, are required to carry out ICN's events and other legitimate activities.

A pragmatic approach is required when considering whether to openly share email addresses between those involved in organising any given activity (eg whether to cc or bcc). It is important to maintain ICN's effectiveness and efficiency (eg making sure people know who else has received a given the message), while at the same time minimising sharing of personal information or protecting it when required.

ICN will adopt the following approach:

- a) *Wide Distribution (eg to all attending an ICN Event):*
 - No email addresses containing an individual's name (either personal addresses or organisation addresses including the person's name) will be shared widely without prior permission.
- b) *Small-Scale Targeted Distribution (to those organising or delivering an ICN Event)*
 - When communicating between a restricted set of people involved in organising or delivering ICN's activities and events, personal email addresses will not be shared overtly without prior permission. However, organisation addresses including a person's name can be shared overtly for this purpose.
 - If people are bcc'd in an email, the sender should make it clear in the email text to what groups of people the email has been sent, to avoid confusion.

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